PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2001031
Expiration Date: April 24, 2006
Project Number: 1997-05-0032002-12-051

Installation Name and Address

McDonnell Douglas Corporation a wholly-owned subsidiary of The Boeing CompanyMcDonnell Douglas Corporation a wholly-owned subsidiary of The Boeing Company
Airport Road and McDonnell BoulevardAirport Road and McDonnell Boulevard
St. Louis, MO 63134St. Louis, MO 63134
St. LouisSt. Louis County

Parent Company's Name and Address

The Boeing CompanyThe Boeing Company
P.O. Box 3707 MS 7A-XEP.O. Box 3707 MS 7A-XE
Seattle, WA 98124-2207Seattle, WA 98124-2207

Installation Description:
McDonnell Douglas Corporation a wholly owned subsidiary of The Boeing Company designs, develops, manufactures, integrates and supports a variety of aerospace and defense products. These include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems, and sensing systems.

Effective Date

Director or Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

McDonnell Douglas Corporation a wholly owned subsidiary of The Boeing Company designs, develops, manufactures, integrates and supports a variety of aerospace and defense products. These include military and commercial aircraft, helicopters, missiles, space launch vehicles and other space systems, and sensing systems.

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations. All the information provided in the table is for informational purposes only. It shall not be construed to create any limits, conditions, or requirements.

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
AS-STL-01	AS-101-01	101	A	B	8	9	1				Vented room (adhesive/sealant application)
AS-STL-01	AS-101-02	101	A	B	8	9	1				Vented room (adhesive/sealant application)
AS-STL-01	AS-101-03	101	A		4		1				Vented hood (adhesives/sealants applications)
AS-STL-01	AS-101-04	101	A		4		1				Two vented hoods (adhesive/sealant applications)
AS-STL-01	AS-STL-01	PW						---	---	---	Plantwide adhesive/sealant usage
BF-STL-02	VS-221-01	221	B		8		1				Vented bench (soldering & solvents)
BF-STL-02	VS-245-01	245	R	T	5		1				Vented solvent storage area
BF-002-03	BF-002-03	2						---	---	---	Handwipe solvent building fugitives in building 2
BF-027-03	BF-027-03	27						---	---	---	Handwipe solvent building fugitives in building 27
BF-029-03	BF-029-03	29						---	---	---	Handwipe solvent building fugitives in building 29 and 29A
BF-048-03	BF-048-03	48						---	---	---	Handwipe solvent building fugitives in building 48
BF-066-03	BF-066-03	66						---	---	---	Handwipe solvent building fugitives in the 60s buildings
BF-101-03	BF-101-03	101						---	---	---	Handwipe solvent building fugitives in building 101
BF-102-03	BF-102-03	102						---	---	---	Handwipe solvent building fugitives in building 102
BF-245-03	BF-245-03	245						---	---	---	Handwipe solvent building fugitives in building 245
BF-STL-01	BF-STL-01	PW						---	---	---	Plantwide Fugitive Painting
BF-STL-02	BF-STL-02	PW						---	---	---	Other miscellaneous plantwide solvent building fugitives
BF-STL-03	BF-STL-03	PW						---	---	---	Handwipe solvent building fugitives in buildings other than buildings with their own point

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
CC-101-01	CC-101-03	101	D		11		1			1963	Cold cleaner used for tube cleaning
CC-STL-01	CC-101-14	101	A		4		1			1989	Hood venting a drying rack
CC-STL-01	CC-102-01	102	C1		11		1			1977	Cold cleaner for hydraulic equipment
CC-STL-01	CC-105-01	105					1	Vapo-Kleen	400-1618RFDF (Renovated)	1996	Cold cleaner for electronics only (Moving to 101)
CC-STL-01	CC-221-01	221	B		8		1			1995	Cold cleaner for electronics only
CC-STL-01	CC-STL-01A	PW						---	---	---	Plantwide cold cleaners greater than 1 gal and 1 ft^2 surface area
BF-STL-02	CC-STL-01B	PW						---	---	---	Plantwide spray gun cleaning
CS-005-01	CS-005-02	5					2	Riley Stoker	P11 #19WW	1984	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-03	5					2	Riley Stoker	P11 #19WW	1984	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-04	5					2	Riley Stoker	P11 #19WW	1984	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-05	CS-005-05	5					2	Keeler	BHS-7069 WW HS1431	1967	Natural gas/fuel oil boiler (77.0 MMBTU/hr)
CS-STL-01	CS-025-01	25					NE	Trane	ODF 9000	1977	Natural gas boiler {8.5 MMBTU/hr}
CS-048-01	CS-048-01	48	-A		4		2			1998	Natural gas boiler (25.1 MMBTU/hr)
CS-STL-01	CS-066-01	66	A		2		1			1966	Natural gas boiler {6.3 MMBTU/hr}
CS-STL-01	CS-066-02	66	A		2		1			1966	Natural gas boiler {6.3 MMBTU/hr}
CS-STL-01	CS-066-03	66	A		10		1			1966	Natural gas boiler/fuel oil back-up {6.3 MMBTU/hr}
CS-STL-01	CS-066-04	66	A		10		1			1966	Natural gas boiler/fuel oil back-up {6.3 MMBTU/hr}
CS-101-01	CS-101-01	101	L		1		1	Combustion Engineering		1962	Natural gas/fuel oil boiler (52.0 MMBTU/hr)
CS-101-01	CS-101-02	101	L		1		1	Combustion Engineering		1962	Natural gas/fuel oil boiler (52.0 MMBTU/hr)
CS-101-03	CS-101-03	101	J		3		1	Superior		1957	Natural gas/fuel oil boiler {20.8

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
											MMBTU/hr}
CS-101-03	CS-101-04	101	J		3		1	Superior		1957	Natural gas/fuel oil boiler {20.8 MMBTU/hr}
CS-102-01	CS-102-01	102	F	G	17	19	1	Erie City	1805	1962	Natural gas/fuel oil boiler {79.6 MMBTU/hr}
CS-102-02	CS-102-02	102	E	F	17	19	1	Cleaver Brooks	CB 800 HP	1988	Natural gas/fuel oil boiler (33.476 MMBTU/hr)
CS-102-02	CS-102-03	102	E	F	17	19	1	Superior		1957	Natural gas/fuel oil boiler {25.2 MMBTU/hr}
CS-110-01	CS-110-01	110					Basement	Cleaver Brooks	CB-250	1979	Natural gas boiler/fuel oil back-up (10.461 MMBTU/hr)
CS-110-01	CS-110-02	110					Basement	Cleaver Brooks	CB-250	1979	Natural gas boiler/fuel oil back-up (10.461 MMBTU/hr)
CS-111-01	CS-111-01	111	O		4		1	Superior	4-5-2506-LGP	1984	Natural gas boiler/fuel oil back-up (16.8 MMBTU/hr)
CS-111-01	CS-111-02	111	O		4		1	Superior	4-5-2506-LGP	1984	Natural gas boiler/fuel oil back-up (16.8 MMBTU/hr)
CS-STL-01	CS-111-03	111	O		4		1	Superior	4-5-751-S15-GP	1984	Natural gas boiler/fuel oil back-up (6.3 MMBTU/hr)
CS-STL-01	CS-221-01	221	D	E	3	4	1	Power Master	4020944	1953	Natural gas boiler (3.3475 MMBTU/hr)
CS-STL-01	CS-221-02	221	D	E	3	4	1	Power Master	4020944	1953	Natural gas boiler (3.3475 MMBTU/hr)
CS-STL-01	CS-STL-01A	PW						---	---	---	Plantwide combustion (indirect natural gas)
CS-STL-01	CS-STL-01C	PW						---	---	---	Plantwide combustion (propane)
NONE	DP-STL-01	PW						---	---	---	Plantwide mechanical depainting
PT-101-04	DT-101-01	101	R		30		1			1994	Dip tank used for developing (stoddard solvent)
NONE	EG-002-01	2	ABB		45		1				Diesel emergency generator
NONE	EG-002-02	2					E	Kohler			Diesel emergency generator (in shed)
	EG-009-01	9					N			1996	Diesel emergency generator
	EG-009-02	9					E				Diesel emergency generator (for pump)
NONE	EG-020-01	20					1				Diesel emergency generator

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
NONE	EG-026-01	26					1				Diesel emergency generator (for fire pump)
NONE	EG-029-01	29	F		1	2	1				Natural gas emergency generator
NONE	EG-029A-02	29A	M		17		2				Natural gas emergency generator (200HP)
NONE	EG-033-01	33	B		10		1	Kohler	150ROZJ81		Diesel emergency generator
NONE	EG-034-01	34	S		22		1	Caterpillar	D318		Diesel emergency generator
NONE	EG-045-01	45	L		10		1				Diesel emergency generator
NONE	EG-056-01	56					1				Diesel emergency generator (50 HP)
NONE	EG-064-01	64	N		6		2				Natural gas emergency generator (250 HP @ 1800 RPM)
NONE	EG-066-01	66	D		2		1				Natural gas emergency generator (250 HP)
NONE	EG-066-02	66					S				Diesel emergency generator (for fire pump)
NONE	EG-067-01	67					W				Diesel emergency generator
NONE	EG-101-01	101	J		3		1				Diesel emergency generator
NONE	EG-101A-01	101A	F		1		1				Natural gas emergency generator
NONE	EG-102-01	102	F	G	17	19	1				Diesel emergency generator
NONE	EG-103-01	103	B		7		1				Diesel emergency generator
NONE	EG-106-01	106	B		5		1				Diesel emergency generator
NONE	EG-107-01	107	B		6		1				Diesel emergency generator
NONE	EG-110-01	110					Base.				Natural gas emergency generator
NONE	EG-111-01	111	I		3		1				Diesel emergency generator
NONE	EG-122-01	122					1				Diesel emergency generator
NONE	EG-220-01	220	BB		18		1	Kohler	150ROZJ81		Diesel emergency generator
NONE	EG-HQ-01	100	A		11		1				Diesel emergency generator
NONE	GB-027-02	27	Q	U	17	21	1	Vacu-Blast		1968	Walk-in grit blaster
NONE	HW-STL-01	PW						---	---	---	Plantwide handling of hazardous waste
NONE	IT-027-01T	27	FF	GG	30	34	1				Immersion tank 1 in the titanium line
PT-027-06	IT-027-02A	27	DD	FF	30	34	1			1973	Immersion tank 2 in the aluminum line
PT-027-08A	IT-027-02P	27	V	Z	32	34	1				Immersion tank 2 in the plating line

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
NONE	IT-027-02T	27	FF	GG	30	34	1				Immersion tank 2 in the titanium line
PT-027-08A	IT-027-03P	27	V	Z	32	34	1				Immersion tank 3 in the plating line
PT-027-08A	IT-027-04P	27	V	Z	32	34	1				Immersion tank 4 in the plating line
NONE	IT-027-05T	27	FF	GG	30	34	1				Immersion tank 5 in the titanium line
PT-027-12	IT-027-06A	27	DD	FF	30	34	1				Immersion tank 6 in the aluminum line
PT-027-02	IT-027-06T	27	FF	GG	30	34	1				Immersion tank 6 in the titanium line
NONE	IT-027-07T	27	FF	GG	30	34	1				Immersion tank 7 in the titanium line
PT-027-05	IT-027-08A	27	DD	FF	30	34	1			1961	Immersion tank 8 in the aluminum line
PT-027-01	IT-027-08T	27	FF	GG	30	34	1				Immersion tank 8 in the titanium line
PT-027-09A	IT-027-09P	27	V	Z	32	34	1				Immersion tank 9 in the plating line
PT-027-01	IT-027-09T	27	FF	GG	30	34	1				Immersion tank 9 in the titanium line
PT-027-08B	IT-027-10P	27	V	Z	32	34	1				Immersion tank 10 in the plating line
PT-027-05	IT-027-11A	27	DD	FF	30	34	1			1961	Immersion tank 11 in the aluminum line
NONE	IT-027-11T	27	FF	GG	30	34	1				Immersion tank 11 in the titanium line
PT-027-03	IT-027-12A	27	DD	FF	30	34	1			1969	Immersion tank 12 in the aluminum line
PT-027-08B	IT-027-12P	27	V	Z	32	34	1				Immersion tank 12 in the plating line
PT-027-03	IT-027-13A	27	DD	FF	30	34	1			1969	Immersion tank 13 in the aluminum line
NONE	IT-027-17P	27	V	Z	32	34	1				Immersion tank 17 in the plating line
PT-027-08B	IT-027-22P	27	V	Z	32	34	1				Immersion tank 22 in the plating line
NONE	IT-027-24P	27	V	Z	32	34	1				Immersion tank 24 in the plating line
PT-027-08B	IT-027-27P	27	V	Z	32	34	1				Immersion tank 27A in the plating line
PT-027-10	IT-027-28P	27	V	Z	32	34	1				Immersion tank 28 in the plating line
NONE	IT-027-30P	27	V	Z	32	34	1				Immersion tank 30 in the plating line
NONE	IT-027-32P	27	V	Z	32	34	1				Immersion tank 32 in the plating line
PT-027-10	IT-027-33P	27	V	Z	32	34	1				Immersion tank 33 in the plating line
PT-027-10	IT-027-34P	27	V	Z	32	34	1				Immersion tank 34 in the plating line
PT-027-10	IT-027-35P	27	V	Z	32	34	1				Immersion tank 35 in the plating line
NONE	IT-027-36P	27	V	Z	32	34	1				Immersion tank 36 in the plating line
NONE	IT-027-37P	27	V	Z	32	34	1				Immersion tank 37 in the plating line

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
PT-027-10	IT-027-38P	27	V	Z	32	34	1				Immersion tank 38 in the plating line
NONE	IT-027-43P	27	V	Z	32	34	1				Immersion tank 43 in the plating line
NONE	IT-027-44P	27	V	Z	32	34	1				Immersion tank 44 in the plating line
NONE	IT-027-46P	27	V	Z	32	34	1				Immersion tank 46 in the plating line
NONE	IT-027-47P	27	V	Z	32	34	1				Immersion tank 47 in the plating line
PT-027-09B	IT-027-49P	27	V	Z	32	34	1				Immersion tank 49 in the plating line
NONE	IT-027-50P	27	V	Z	32	34	1				Immersion tank 50 in the plating line
NONE	IT-027-EA	27	DD	FF	30	34	1				Immersion tank E in the aluminum line
NONE	IT-027-GA	27	DD	FF	30	34	1				Immersion tank G in the aluminum line
NONE	IT-027-HA	27	DD	FF	30	34	1				Immersion tank H in the aluminum line
NONE	IT-027-JA	27	DD	FF	30	34	1			1979	Immersion tank J in the aluminum line
NONE	IT-027-KA	27	DD	FF	30	34	1			1979	Immersion tank K in the aluminum line
PT-027-07	IT-027-MA	27	DD	FF	30	34	1			1969	Immersion tank M in the aluminum line
PT-029A-01	IT-029A-02	29A	B	C	12		1			1997	Immersion tank 2 in the tank line
PT-029A-01	IT-029A-03	29A	B	C	12		1			1997	Immersion tank 3 in the tank line
PT-029A-01	IT-029A-04	29A	B	C	12		1			1997	Immersion tank 4 in the tank line
PT-029A-01	IT-029A-05	29A	B	C	12		1			1997	Immersion tank 5 in the tank line
PT-029A-01	IT-029A-06	29A	B	C	12		1			1997	Immersion tank 6 in the tank line
PT-029A-01	IT-029A-10	29A	B	C	12		1			1997	Immersion tank 10 in the tank line
PT-029A-01	IT-029A-11	29A	B	C	12		1			1997	Immersion tank 11 in the tank line
PT-029A-01	IT-029A-14	29A	B	C	12		1			1997	Immersion tank 14 in the tank line
PT-029A-01	IT-029A-15	29A	B	C	12		1			1997	Immersion tank 15 in the tank line
PT-029A-01	IT-029A-16	29A	B	C	12		1			1997	Immersion tank 16 in the tank line
PT-029A-01	IT-029A-17	29A	B	C	12		1			1997	Immersion tank 17 in the tank line
PT-029A-01	IT-029A-18	29A	B	C	12		1			1997	Immersion tank 18 in the tank line
NONE	IT-051-01A	52	A	B	4	5	1			1963	Immersion tank 1 in the aluminum line
NONE	IT-051-01T	52	A	B	6		1			1963	Immersion tank 1 in the titanium line
NONE	IT-051-02T	52	A	B	6		1			1963	Immersion tank 2 in the titanium line
PT-051-02	IT-051-03T	52	A	B	6		1			1963	Immersion tank 3 in the titanium line
NONE	IT-051-04A	52	A	B	4	5	1			1963	Immersion tank 4 in the aluminum line
NONE	IT-051-04T	52	A	B	6		1			1963	Immersion tank 4 in the titanium line
PT-051-02	IT-051-05T	52	A	B	6		1			1963	Immersion tank 5 in the titanium line

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
NONE	IT-051-06A	52	A	B	4	5	1			1963	Immersion tank 6 in the aluminum line
PT-101-04	IT-101-01N	101	R		30		1			1994	Immersion tank (Desmut) in the nameplate line
PT-101-04	IT-101-02N	101	R		30		1			1994	Immersion tank (Strip) in the nameplate line
PT-101-04	IT-101-03N	101	R		30		1			1994	Immersion tank (Water) in the nameplate line
PT-101-04	IT-101-04N	101	R		30		1			1994	Immersion tanks (hand tanks) in the nameplate line
PT-101-01	IT-101-05A	101	A	B	30	36	1			1984	Immersion tank 5 in the aluminum line
PT-101-02	IT-101-06A	101	A	B	30	36	1			1984	Immersion tank 6 in the aluminum line
PT-101-03	IT-101-07A	101	A	B	30	36	1			1984	Immersion tank 7 in the aluminum line
CL-048-01	MB-048-01	48	A	G	5	6	1			1986	Vented paint mixing hoods (2)
CL-063-01	MB-063-01	63	F		3		1			1986	Vented paint mixing rooms (2)
MC-STL-01	MC-STL-01	PW									Plantwide chemical depainting
ML-051-01	ML-051-01	51	A	C	7	15	1			1997	Large waterbased maskant line
NONE	ML-051-02	51	A		6	8	1				Small waterbased maskant line
MO-029-A	MO-029-01	29	I		1		1			1981	Lead melting furnace
MO-029-A	MO-029-02	29	I		1		1			1986	Lead melting furnace
NONE	MS-027-04	27					Shelter				Hazardous waste shelter
MS-027-06	MS-027-06	27	C		34		BASE MENT			1997	Cutting fluid concentrator
DB-027-01	PI-027-01	27	BB		23	25	1			1976	Penetrant inspection booth
DB-027-01	PI-027-02	27	BB		23	25	1			1976	Penetrant inspection booth
CL-002-01	SB-002-01	2	B		5		2			1990	Large spray booth (production parts)
AS-STL-01	SB-002-04	2	A		26		2				Booth for various activities (adhesive/sealants)
CL-002-02	SB-002-06	2	F		22		2	DeVilbiss	SDF6240	1980	Spray booth (maintenance) (sanding)
CL-022-01	SB-022-01	22	C		7		1	Binks	DTSP-4373	1958	Spray booth (vehicle maintenance)
CL-027-01	SB-027-01	27	Z	DD	30	34	1	DeVilbiss		1945	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-02	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
CL-027-01	SB-027-03	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-04	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-05	27	Z	DD	30	34	1	DeVilbiss		1943	Paint booth (mostly production) (some sanding)
CL-029-01	SB-029-01	29A	A	D	11		1	DeVilbiss		1997	Adhesive bonding coating line
CL-029-02	SB-029A-02	29A	A	B	18	19	1			1997	Spray booth (mostly QA/QC) (possible production)
CL-048-01	SB-048-01	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-02	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-03	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-04	48	A	G	1	10	1	DeVilbiss		1967	Paint booth (aerospace production)
CL-048-01	SB-048-05	48	A	G	1	10	1			1997	Paint booth (aerospace production)
CL-048-01	SB-048-06	48	A	G	1	10	1			1997	Paint booth (aerospace production)
ML-051-01	SB-051-01	51	A		7		1			1997	Maskant spray booth
CL-060-01	SB-060-01	60	T		9		1			1990	Spray booth (cans of primer)(research and development)
CL-063-01	SB-063-01	63	F		2		1			1986	Spray booth (paint & others)(aerospace production)
CL-066-01	SB-066-01	66	H		7		1			1984	Spray booth (aerospace production) (painting and sanding)
CL-066-01	SB-066-02	66	J		10		1			1984	Spray Booth (research and development)
CL-101-02	SB-101-02	101	G		1		1			1990	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-04	101D	Rm 105				1	DeVilbiss		1994	Spray booth (research and development)
CL-101-03	SB-101-06	101D	Rm 101				1			1986	Spray booth (mock-up & tooling) (could be used for production)
NONE	SB-101-10	101D	Rm 205				2	Metco		1988	Spray Booth (Plasma spray coater) (research and development)
CL-101-01	SB-101-25	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
CL-101-01	SB-101-26	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-27	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
AS-STL-01	SB-101-29	101	Q		54		1			1988	Spray booth (sealants and adhesives)
CL-101-01	SB-101-30	101	A		25	29	1	DeVilbiss		1963	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-33	101	G		1		1	Binks		1961	Spray booth (aerospace production) (painting and sanding)
NONE	SB-101-34	101	B		18		1				Spray Booth (Arc Spray)
CL-101-03	SB-101-35	101D	Rm 216				1			1986	Spray booth (robotic & hand applied) (research and development) (could be used for production)
CL-101-01	SB-101-39	101	A		25	29	1	DeVilbiss	SL-1360	1964	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40	101	F		1		1	DeVilbiss		1961	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40A	101	F		1		1	DeVilbiss		1961	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-41	101D	Rm 111				1	Binks		1987	Spray booth (research and development) (could be used for production)
CL-101-03	SB-101-43	101D	Rm 208				2			1986	Spray booth (robotic & hand applied) (research and development)
CL-101-01	SB-101-44	101	R		30		1	Binks		1994	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-03	SB-101-45	101	P1		30	33	1			1996	Robotic Sprayer (research and development)
CL-102-01	SB-102-01	102	H		15		3	Binks		1983	Bench spray booth (research & development)
AS-STL-01	SB-102-02	102	H		13	15	3	Binks		1983	Bench spray booth (lab) (epoxy spray) (research and development)
CL-102-01	SB-102-03	102	C		16		1	DeVilbiss	XDF 6224	1984	Paint booth (aerospace)(mostly research and development) (some aerospace production)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
CL-245-02	SB-245-02	245	C		29		1			1989	Paint booth (maintenance)
CL-248-01	SB-248-01	248	Rm 134				1			1990	Paint booth (mock-up)(research and development)
SP-005-01	SP-005-01	5					E	---	---	---	Coal storage pile
NONE	ST-005-20	5					E				Fuel oil # 2 UST (20,000 gal)
NONE	ST-005-21	5					E				Fuel oil # 2 UST (20,000 gal)
ST-STL-01	ST-022-22	22					E				Gasoline UST (8,000 gal)
ST-STL-01	ST-022-25	22					E				Gasoline UST (10,000 gal)
ST-STL-01	ST-041-20	41					W				Gasoline UST (8,000 gal)
NONE	ST-041-21	41					W				Jet fuel UST #1 (30,000 gal)A-41
NONE	ST-041-22	41					W				Jet fuel UST #2 (30,000 gal) B-41
NONE	ST-041-23	41					W				Jet fuel UST #3 (30,000 gal) C-41
NONE	ST-041-24	41					W				Jet fuel UST #4 (30,000 gal) D-41
ST-STL-01	ST-066-02	66					SE				Gasoline storage tank (~560 gal)
NONE	ST-102-21	102					E				Fuel oil #2 UST (20,000 gal)
ST-STL-01	ST-102B-01	102B					E				Gasoline storage tank (298 gal)
NONE	ST-110-20	110					SE				Fuel oil #2 UST (15,000 gal)
NONE	ST-111-01	111					N				Fuel oil #2 underground storage tank (12,000 gal)
ST-120-01	ST-120-01	120					S				Vertical fuel oil #2 (107,000 gal)
ST-120-02	ST-120-02	120					S				Vertical fuel oil #2 (50,000 gal)
ST-STL-01	ST-121-01	121					NW				Gasoline tank (550 gal)
ST-STL-01	ST-220-01	220					W				Gasoline tank (~300 gal)
ST-STL-01	ST-245-02	245					SE				Gasoline tank (301 gal)
VD-027-01	VD-027-01	27	U		30		1			1998	Vapor degreaser (trichloroethylene)
VD-029-01	VD-029-01	29A	B		12		1	Baron-Blakeslee		1997	Vapor degreaser (trichloroethylene)
VD-042-01	VD-042-01	42	D	E	7		4			1982	Vapor degreaser (Vertrel SMT) *PHILLIPS*
VD-101-01	VD-101-01	101	D	E	6	17	1			1982	Vapor degreaser (trichloroethylene)
VD-101-02	VD-101D-04	101D	Rm 205				2			1995	Vapor degreaser (trichloroethylene)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN-STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM1	NUM2	LEVEL				
VD-102-01	VD-102-01	102	A		13	15	1			1982	Vapor degreaser (trichloroethylene)

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. All of the information provided in the table is for informational purposes only. It shall not be construed to create any limits, conditions or requirements.

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM 1	NUM 2	LEVEL				
CC-STL-01	CC-245-04	245	C		29		1				Solvent bath used for cleaning paint brushes
CC-STL-01	CC-STL-01C	PW						---	---	---	Plantwide cleaning units less than 1 gal or 1 ft^2 surface area
CS-027-01	CS-027-01	27	Z	DD	30	34	1				Natural gas Make-Up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-02	27	Z	DD	30	34	1				Natural gas Make-Up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-03	27	Z	DD	30	34	1				Natural gas Make-Up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-04	27	Z	DD	30	34	1				Natural gas Make-Up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-05	27	Z	DD	30	34	1				Natural gas Make-Up air heater {12.2 MMBTU/hr}
CS-027-01	CS-027-06	27	Z	DD	30	34	1				Natural gas Make-Up air heater {12.2 MMBTU/hr}
CS-STL-01	CS-STL-01B	PW						---	---	---	Plantwide combustion (direct natural gas)
CT-STL-01	CT-STL-01A	PW						---	---	---	Plantwide forced draft cooling towers

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN LET1	COLUMN LET2	COLUMN NUM 1	COLUMN NUM 2	LEVEL				
CT-STL-01	CT-STL-01B	PW						---	---	---	Plantwide spray ponds
CU-STL-01	CU-STL-01A	PW						---	---	---	Plantwide composite emissions
FA-005-01	FA-005-01	5					N				Fly Ash Collection System
NONE	IT-027-01A	27	DD	FF	30	34	1				Immersion tank 1 in the aluminum line
PT-027-04	IT-027-04A	27	DD	FF	30	34	1				Immersion tank 4 in the aluminum line
NONE	IT-027-14P	27	V	Z	32	34	1				Immersion tank 14 in the plating line
NONE	IT-027-15P	27	V	Z	32	34	1				Immersion tank 15 in the plating line
PT-027-11	IT-027-18A	27	DD	FF	30	34	1				Immersion tank 18 in the aluminum line
NONE	IT-027-20A	27	DD	FF	30	34	1				Immersion tank 20 in the aluminum line
NONE	IT-027-40P	27	V	Z	32	34	1				Immersion tank 40 in the plating line
NONE	IT-027-51P	27	V	Z	32	34	1				Immersion tank 51 in the plating line
PT-051-01	IT-051-03A	52	A	B	4	5	1				Immersion tank 3 in the aluminum line
NONE	IT-101-01A	101	A	B	30	36	1				Immersion tank 1 in the aluminum line
PT-101-04	IT-101-01P	101	R		36		1				Immersion tank (1) in the passivate line
PT-101-04	IT-101-02P	101	R		36		1				Immersion tank (2) in the passivate line
PT-101-04	IT-101-04P	101	R		36		1				Immersion tank (4) in the passivate line
PT-101-04	IT-101-07P	101	R		36		1				Immersion tank (7) in the passivate line
NONE	IT-101-A1A	101	A	B	30	36	1				Immersion tank A1 in the aluminum line
NONE	IT-101-A2A	101	A	B	30	36	1				Immersion tank A2 in the aluminum line
NONE	IT-101-AA	101	A	B	30	36	1				Immersion tank A in the aluminum line
PT-101-03	IT-101-HA	101	A	B	30	36	1				Immersion tank H in the aluminum line
NONE	LH-STL-01	PW						---	---	---	Plantwide lab hoods
NONE	LS-102-01	102	F		5	8	1				HF/DF laser used for testing
CL-002-01	MB-002-01	2	B		1		2				Vented paint mixing room
CL-002-02	MB-002-02	2	F	G	23		2				Vented paint mixing room
CL-101-03	MB-101-01	101	P	Q	30	33	1				Vented hood for paint mixing
CL-101-03	MB-101-02	101	P2		30		1				Vented paint mixing hood
CL-101-01	MB-120-01	120	S Wall				1				Vented chemical mixing/dispensing room
CL-245-02	MB-245-01	245	C		29		1				Vented paint mixing room
MP-STL-01	MP-STL-01	PW						---	---	---	Plantwide maintenance painting

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN LET1	LET2	NUM 1	NUM 2	LEVEL				
CU-STL-01	MS-029A-04	029A	H		17		1				Fiber placement machine for composites
NONE	MS-111-02	111	H/7	M	3	7	1				Scrubbers (3) to control lab equipment
NONE	MS-STL-01	PW						---	---	---	Plantwide hand held equipment (such as sanders, drills, riveters, ...)
NONE	MT-245-02	245	F		9		1				Tank containing concentrated cutting fluid
NONE	MT-245-03	245	F		9		1				Cutting fluid mix tank
HT-245-01	OV-245-04	245	R	N	23	24	1				Electric austenizing furnace (Endothermic gas atmosphere)
HT-245-01	OV-245-05	245	R	N	23	24	1				Electric austenizing furnace (Endothermic gas atmosphere)
HT-245-01	OV-245-06	245	R		24		1				Endothermic gas generator
Various	OV-STL-01	PW						---	---	---	Plantwide electric curing ovens
Various	OV-STL-02	PW						---	---	---	Plantwide electric burn-off ovens
NONE	PE-STL-01	PW						---	---	---	Plantwide particulate emitting sources not specifically listed
NONE	PT-101-06	101	U		54		1				Process tank line (small line)
NONE	PT-101D-05	101D	Rm 212	Rm 214	Rm 216		2				Process tank line (R&D)
NONE	PT-102-01	102	A		13		1				Process tank line (small line)
NONE	PT-102-02	102	H		13	15	3				Process tank line (R&D/ QA/QC)
NONE	PT-248-01	248	A	K	3	7	1				Process tank lines (R&D)
RF-STL-01	RF-STL-01	PW						---	---	---	Plantwide gasoline refueling
RF-STL-02	RF-STL-02	PW						---	---	---	Plantwide aircraft refueling
NONE	SB-002-02	2	FFG	G	23	25	1				Booth for fan maintenance (cleaning not painting)
CL-002-02	SB-002-03	2	F		23		2				Bench Spray booth (aerosol cans)
MP-STL-01	SB-002-05	2	AAB		36		1				Spray booth (maintenance) (aerosol cans)
BF-STL-02	SB-042-01	42	D	E	7	8	4				Vented hood (Electronics coatings) (brushed or dipped not sprayed)
NONE	SB-042-02	42	D	E	7	8	4				Vented hood (Laminar Bench) (soldering)
NONE	SB-042-03	42	D		1		3				Vented hood (soldering)

EIQ POINT NO.	EMISSION UNIT NO.	LOCATION						MANUFACTURER	MODEL NUMBER	YEAR IN STALLED	DESCRIPTION
		BLDG	COLUMN LET1	COLUMN LET2	COLUMN NUM 1	COLUMN NUM 2	LEVEL				
CL-101-01	SB-101-01	101	N		30		1				Spray booth (lockfoam operations)
CL-101-01	SB-101-03	101	P		30		1				Lab hood for conformal coating of parts
CL-101-01	SB-101-07	101	N	P	30		1				Bench spray booth (4 sections) (lockfoam operations) (no painting)
CL-101-01	SB-101-46	101	Q		54		2				Spray booth (Aerosol Cans)
NONE	SB-107-01	107	B		2		1				Hood used for hydraulic testing
CL-245-01	SB-245-05	245	A		22		1				Small paint booth (Aerosol cans and grinding)
CL-245-01	SB-245-03	245	R	T	4		1				Vented painting area (tooling ony, possible maintenance)
NONE	SC-STL-01	PW						---	---	---	Plantwide salt corrosion chambers
NONE	ST-STL-D	PW						---	---	---	Plantwide Diesel/Fuel Oil/Jet Fuel Storage Tanks (<=10,000 gallons)
NONE	VR-STL-01	PW						---	---	---	Plantwide Diesel Refueling
WE-STL-01	WE-STL-01	PW						---	---	---	Plantwide welding

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1)None

II.Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

I)Federally Enforceable Requirements

Permit Condition PW001

10 CSR 10-6.080
Emission Standards for Hazardous Air Pollutants
40 CFR Part 61 Subpart M
National Emission Standard for Asbestos

Emission Limitations:

(1)Before engaging in any renovation or demolition activity that would disturb more than 260 linear feet of regulated asbestos containing material ("RACM") on pipes or 160 square feet of RACM on other building components, the permittee shall hire a certified asbestos abatement contractor to abate the RACM in the part of the facility that will be disturbed by the renovation or demolition activity.
(2)Prior to commencement of any demolition or renovation activity at the facility, the permittee shall inspect the part of the facility that will be affected by the demolition or renovation activity for RACM.
(3)The permittee shall require the certified asbestos abatement contractor hired to abate RACM in accordance with subsection (1) above to comply with the following:

(a)the work practices for asbestos emission control pursuant to 61.145(c);
(b)the work practices and procedures for waste disposal pursuant to 61.150; and
(c)the work practices for air cleaning pursuant to 61.152.

Record Keeping:

The permittee or its qualified asbestos abatement contractor shall keep records as required by 40 CFR 61.145(c)(7), 61.145(c)(8) and 61.150(d)(1).

Monitoring:

None

Reporting:

(1)Notices required by 61.145(b) shall be submitted by the Missouri Certified Asbestos Abatement contractor or the permittee.
(2)These notices do not need to be certified by a responsible official.

Permit Condition PW002

10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds

Emission Limitations:

(1)Section (4)
(a)No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those in 10 CSR 10-6.010, *Ambient Air Quality Standards.*

(3)Section (5)
(a)Fuel oil and coal burned at this facility must have a sulfur content of no greater than 2% from October through March and no greater than 4% for the rest of the year.
(b)Propane and natural gas combustion have no requirements placed on them in this section.

Record Keeping:
The permittee shall maintain a record of the sulfur content of the fuel oil and coal as purchased. (ex. bill of lading, MSDS, or other)

Monitoring:
None

Reporting:
The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of an exceedance of the sulfur content limit established under Emission Limitations (2)(a).

Permit Condition PW003

10 CSR 10-6.220
Restriction of Emission of Visible Air Contaminants

a)Emission Limitations:
1.The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of an opacity greater than 20%, unless it is an existing source (existing prior to March 24, 1967), which emits less than 25 lbs/hr PM.
2.If it is an existing source, which emits less than 25 lbs/hr PM, then the permittee shall not discharge into the ambient air any air contaminant of an opacity greater than 40%.
3.A source with a 20% limit may emit air contaminants with an opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
4.Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.

b)Record Keeping Requirements:
1.Monthly
a.The permittee shall maintain records of the visual inspections plus records of official Method 9 opacity tests, if required.

c)Monitoring Requirements:
1.Monthly
a.The permittee shall conduct visual observations.
b.Absence of visible emissions will demonstrate compliance.
2.At the time of each occurrence
a.If visible emissions are documented in one of the monthly observations, a certified opacity reader will perform a visible emissions determination using EPA Reference Method 9, *Visual Determination of the Opacity of Emissions*

from Stationary Sources to determine whether emissions exceed the opacity limits set forth above.

d)***Reporting Requirements***:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176,, no later than thirty (30) days after the discovery of an exceedance of the opacity limit established under i) Emission Limitations.

Permit Condition PW004

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

(2)No person may cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter to go beyond the premises of origin in quantities that the particulate matter:

(a)Remains visible in the ambient air beyond the property line of origin; or

(b)May be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined by microscopy or other technique proven to be equally accurate and approved by the director.

Record Keeping:

(1)Monthly

(a)The permittee shall maintain records of the visual inspections.

Monitoring:

(1)Monthly

(a)The permittee shall conduct visual observations.

(b)Absence of visible emissions will demonstrate compliance.

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any fugitive particulate matter being caused or allowed to go beyond the premises of origin, without applying reasonable control measures, in quantities that the particulate matter remains visible in the ambient air or is found on surfaces.

Permit Condition PW005

10 CSR 10-5.450

Control of VOC Emissions from Traffic Coatings

Emission Limitations:

The VOC content of traffic coatings may not exceed 1.26 lbs/gallon.

Record Keeping:

Records (such as MSDS, purchasing records,...) showing the VOC content of the traffic coatings used will be kept.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any use of traffic coating that exceed the 1.26 lbs/gallons VOC content limit.

II State/Local Only Enforceable Requirements

Permit Condition PW006

10 CSR 10-6.250
Asbestos Abatement Projects - Certification, Accreditation and Business Exemption Requirements

Emission Limitations:

(1)The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250.
(a)An individual must receive certification from the department before that individual participates in an asbestos abatement project operating in Missouri according to section (3). This certification is annually renewable.
(b)Certification as an AHERA inspector, AHERA management planner and AHERA project designer apply to AHERA-related projects.

Record Keeping:

Any appropriate record keeping to demonstrate compliance with Certification and Accreditation standards.

Monitoring:

None

Reporting:

None

II.Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

EU0010
Units With Permits, But No Other Applicable Limits

		FEDERAL	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	**DESCRIPTION** (for information only, this does not create any permit requirements)
AS-STL-01	SB-102-02	#1207	Bench spray booth (lab) (epoxy spray) (research and development)
CC-STL-01	CC-101-14	#1711	Hood venting a drying rack
CL-022-01	SB-022-01	OP	Spray booth (vehicle maintenance)
CL-048-01	MB-048-01	#5489	Vented paint mixing hoods (2)
CL-063-01	MB-063-01	#1491	Vented paint mixing rooms (2)
DB-027-01	PI-027-01	OP	Penetrant inspection booth
DB-027-01	PI-027-02	OP	Penetrant inspection booth
MO-029-A	MO-029-01	#1087	Lead melting furnace
MO-029-A	MO-029-02	#1520	Lead melting furnace
MS-027-06	MS-027-06	#6319	Cutting fluid concentrator
NONE	IT-027-01T	OP	Immersion tank 1 in the titanium line
PT-027-06	IT-027-02A	OP	Immersion tank 2 in the aluminum line
PT-027-08A	IT-027-02P	OP	Immersion tank 2 in the plating line
NONE	IT-027-02T	OP	Immersion tank 2 in the titanium line
PT-027-08A	IT-027-03P	OP	Immersion tank 3 in the plating line
PT-027-08A	IT-027-04P	OP	Immersion tank 4 in the plating line
NONE	IT-027-05T	OP	Immersion tank 5 in the titanium line
PT-027-12	IT-027-06A	OP	Immersion tank 6 in the aluminum line
PT-027-02	IT-027-06T	#1306	Immersion tank 6 in the titanium line
NONE	IT-027-07T	OP	Immersion tank 7 in the titanium line
PT-027-01	IT-027-08T	OP	Immersion tank 8 in the titanium line
PT-027-09A	IT-027-9P	OP	Immersion tank 9 in the plating line
PT-027-01	IT-027-09T	OP	Immersion tank 9 in the titanium line
PT-027-08B	IT-027-10P	OP	Immersion tank 10 in the plating line
PT-027-05	IT-027-11A	OP	Immersion tank 11 in the aluminum line
NONE	IT-027-11T	OP	Immersion tank 11 in the titanium line
PT-027-03	IT-027-12A	OP	Immersion tank 12 in the aluminum line
PT-027-08B	IT-027-12P	OP	Immersion tank 12 in the plating line
PT-027-03	IT-027-13A	OP	Immersion tank 13 in the aluminum line
NONE	IT-027-17P	OP	Immersion tank 17 in the plating line
PT-027-08B	IT-027-22P	OP	Immersion tank 22 in the plating line
NONE	IT-027-24P	OP	
PT-027-08B	IT-027-27P	OP	Immersion tank 27A in the plating line
PT-027-10	IT-027-28P	OP	Immersion tank 28 in the plating line
NONE	IT-027-30P	OP	Immersion tank 30 in the plating line
NONE	IT-027-32P	OP	Immersion tank 32 in the plating line
PT-027-10	IT-027-33P	OP	Immersion tank 33 in the plating line
PT-027-10	IT-027-34P	OP	Immersion tank 34 in the plating line
PT-027-10	IT-027-35P	OP	Immersion tank 35 in the plating line
NONE	IT-027-36P	OP	Immersion tank 36 in the plating line
NONE	IT-027-37P	OP	Immersion tank 37 in the plating line
PT-027-10	IT-027-38P	OP	Immersion tank 38 in the plating line
NONE	IT-027-43P	OP	Immersion tank 43 in the plating line
NONE	IT-027-44P	OP	Immersion tank 44 in the plating line
NONE	IT-027-46P	OP	Immersion tank 46 in the plating line

		FEDERAL	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	DESCRIPTION (for information only, this does not create any permit requirements)
NONE	IT-027-47P	OP	Immersion tank 47 in the plating line
PT-027-09B	IT-027-49P	OP	Immersion tank 49 in the plating line
NONE	IT-027-50P	OP	Immersion tank 50 in the plating line
NONE	IT-027-EA	OP	Immersion tank E in the aluminum line
NONE	IT-027-GA	OP	Immersion tank G in the aluminum line
NONE	IT-027-HA	OP	Immersion tank H in the aluminum line
NONE	IT-027-JA	#0950	Immersion tank J in the aluminum line
NONE	IT-027-KA	#0919	Immersion tank K in the aluminum line
PT-027-07	IT-027-MA	OP	Immersion tank M in the aluminum line
PT-029A-01	IT-029A-02	#6260	Immersion tank 2 in the tank line
PT-029A-01	IT-029A-03	#6260	Immersion tank 3 in the tank line
PT-029A-01	IT-029A-04	#6260	Immersion tank 4 in the tank line
PT-029A-01	IT-029A-05	#6260	Immersion tank 5 in the tank line
PT-029A-01	IT-029A-06	#6260	Immersion tank 6 in the tank line
PT-029A-01	IT-029A-10	#6260	Immersion tank 10 in the tank line
PT-029A-01	IT-029A-11	#6260	Immersion tank 11 in the tank line
PT-029A-01	IT-029A-14	#6260	Immersion tank 14 in the tank line
PT-029A-01	IT-029A-15	#6260	Immersion tank 15 in the tank line
PT-029A-01	IT-029A-16	#6260	Immersion tank 16 in the tank line
PT-029A-01	IT-029A-17	#6260	Immersion tank 17 in the tank line
PT-029A-01	IT-029A-18	#6260	Immersion tank 18 in the tank line
NONE	IT-051-01A	OP	Immersion tank 1 in the aluminum line
NONE	IT-051-01T	OP	Immersion tank 1 in the titanium line
NONE	IT-051-02T	OP	Immersion tank 2 in the titanium line
PT-051-02	IT-051-03T	OP	Immersion tank 3 in the titanium line
NONE	IT-051-04A	OP	Immersion tank 4 in the aluminum line
NONE	IT-051-04T	OP	Immersion tank 4 in the titanium line
PT-051-02	IT-051-05T	OP	Immersion tank 5 in the titanium line
NONE	IT-051-06A	OP	Immersion tank 6 in the aluminum line
PT-101-04	IT-101-01N	OP	Immersion tank (Desmut) in the nameplate line
PT-101-04	IT-101-02N	OP	Immersion tank (Strip) in the nameplate line
PT-101-04	IT-101-03N	OP	Immersion tank (Water) in the nameplate line
PT-101-04	IT-101-04N	OP	Immersion tanks (hand tanks) in the nameplate line
PT-101-01	IT-101-05A	OP	Immersion tank 5 in the aluminum line
PT-101-02	IT-101-06A	#1303	Immersion tank 6 in the aluminum line
PT-101-03	IT-101-07A	#1304	Immersion tank 7 in the aluminum line
PT-101-04	DT-101-01	OP	Dip tank used for developing (Stoddard solvent)

OP = Unit is covered by an operating permit, but the construction permit was obtained prior to the effective date of 10 CSR 10-6.060 and was, therefore, extinguished by the issuance of the operating permit.

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0010-001
10 CSR 10-6.060 ***Air Construction Permits***

1)Requirements of the Construction Permit Numbers: #'s 1207, 1711, 1491, 1087, 1520, 1306, 1303, 1304, 0919, 0950, 6319 and 6260

Emission Limitations:

None

Record Keeping:

bNone

c

Monitoring:

None

Reporting:

None

1)Requirements of the Construction Permit Number: #5489 – Paint Mixing Hoods (2)

Emission Limitations:

Emissions from painting operations covered by operating permit 3221, 3275, 3276, 3277, 5489, 6324, and 6447 shall be limited to 18 tons of VOC/year, 18 tons of any combination of HAPs/year or 10 tons of any individual HAP/year within a twelve month rolling period.

Record Keeping:

Permittee shall maintain monthly records of all materials utilized in the paint booths, including the amounts and the content of VOCs and HAPs in each material. These records shall be maintained, on site, for the latest sixty (60) month period.

Monitoring:

None

Reporting:

Should the records indicate that a violation of the emission limitation listed above has occurred, the permittee shall notify the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than the next day.
This notification is not required to be certified by a responsible official.

EU0020
Miscellaneous Specialty Coating Emission Units

		STATE/LOCAL ONLY	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	**DESCRIPTION** (for information only, this does not create any permit requirements)
AS-STL-01	AS-STL-01	X	Plantwide adhesive/sealant usage
AS-STL-01	AS-101-01	X	Vented room (adhesive/sealant application)
AS-STL-01	AS-101-02	X	Vented room (adhesive/sealant application)
AS-STL-01	AS-101-03	X	Vented hood (adhesive/sealant application)
AS-STL-01	AS-101-04	X	Two vented hoods (adhesive/sealant applications)
BF-STL-02	VS-221-01	X	Vented bench (soldering & solvents)
BF-STL-02	VS-245-01	X	Vented solvent storage area
BF-STL-02	BF-STL-02	X	Other miscellaneous plantwide solvent building fugitives

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federal/State/Local Enforceable Requirements

Permit Condition EU0020-001

10 CSR 10-5.295
Control of Emissions From Aerospace Manufacture and Rework Facilities

Emission Limitations:

(1) Specialty coatings shall be limited to a VOC content as expressed in Table I of this rule (See Appendix 1).
(2) Monthly averaging within specialty coating type may be used.

Record Keeping:

(1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
(2) The permittee shall record coating usage on a monthly basis.
(3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery that the VOC content limit set under Emission Limitations is exceeded (see Appendix 1).

EU0030
Handwipe Solvent Building Fugitives

EIQ POINT NUMBER	EMISSION UNIT NUMBER	FEDERAL: 1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Handwipe Solvent Cleaning Operations	STATE/: 1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework Facilities	DESCRIPTION (for information only, this does not create any permit requirements)
BF-STL-03	BF-STL-03	X	X	Handwipe solvent building fugitives in buildings other than buildings with their own point
BF-002-03	BF-002-03	X	X	Handwipe solvent building fugitives in building 2
BF-027-03	BF-027-03	X	X	Handwipe solvent building fugitives in building 27
BF-029-03	BF-029-03	X	X	Handwipe solvent building fugitives in building 29 and 29A
BF-048-03	BF-048-03	X	X	Handwipe solvent building fugitives in building 48
BF-066-03	BF-066-03	X	X	Handwipe solvent building fugitives in the 60s buildings
BF-101-03	BF-101-03	X	X	Handwipe solvent building fugitives in building 101
BF-102-03	BF-102-03	X	X	Handwipe solvent building fugitives in building 102
BF-245-03	BF-245-03	X	X	Handwipe solvent building fugitives in building 245

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0030-001
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
Aerospace Manufacturing and Rework Facilities- Handwipe Solvent Cleaning
10 CSR 10-6.065 and 40 CFR Part 63, Subpart A
General Provisions
10 CSR 10-5.295
Control of Emissions from Aerospace Manufacture and Rework Facilities

Emission Limitations:

(1) Hand-wipe cleaning:

(a) Each owner or operator of a new or existing affected hand-wipe cleaning operation covered by 40 CFR Part 63, Subpart GG, shall use cleaning solvents that meet one of the following requirements:
   1. Meet (1) one of the composition requirements in section 63.744 (Table 1) of the Aerospace NESHAP. (§63.744(b)(1))
   2. Have a composite vapor pressure of 45 mm Hg or less at 20° Celsius. (68° Fahrenheit) (§63.744(b)(2))
   3. Demonstrate that the volume of hand-wipe cleaning solvents used in affected cleaning operations has been reduced by at least 60% from a baseline adjusted for production. The baseline shall be established as part of an approved alternative plan administered by the State. (§63.744(b)(3))

(b) The following cleaning operations are exempt from the requirements of (2) Hand-wipe cleaning:
   1. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen; (§63.744(e)(1))
   2. Cleaning during the manufacture, assembly, installation, maintenance or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine, etc.); (§63.744(e)(2))
   3. Cleaning and surface activation prior to adhesive bonding; (§63.744(e)(3))
   4. Cleaning of electronic parts and assemblies containing electronic parts; (§63.744(e)(4))
   5. Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to air heat exchangers and hydraulic fluid systems; (§63.744(e)(5))
   6. Cleaning of fuel cells, fuel tanks, and confined spaces; (§63.744(e)(6))
   7. Surface cleaning of solar cells, coated optics, and thermal control surfaces; (§63.744(e)(7))
   8. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used in the interior of the aircraft; (§63.744(e)(8))
   9. Cleaning of metallic and non-metallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components; (§63.744(e)(9))
   10. Cleaning and cleaning solvent usage associated with research and development, quality control, and laboratory testing; (§63.744(e)(10))
   11. Cleaning of aircraft transparencies, polycarbonate or glass substrates; (§63.744(e)(11))
   12. Cleaning operations, using nonflammable liquids, conducted within five (5) feet of energized electrical systems. Energized electrical systems means AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells and tail sections; and (§63.744(e)(12))

13. Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR 82.4. (§63.744(e)(13))

(2) Operational Limitations:
Housekeeping measures
Permittee shall institute and carry out a housekeeping program that requires the following:

1. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in aerospace production in closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain, as practicable, the vapors of the cleaning solvent. Cotton-tipped swabs ~~or equivalent~~ used for very small cleaning operations are exempt from this requirement. (§63.744(a)(1))
2. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers. (§63.744(a)(2))
3. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills. (§63.744(a)(3))

(3) This rule is only applicable to actual manufacture and rework of production aerospace vehicles.

Record Keeping:

(1) Each owner or operator of a new or existing cleaning operation shall record the information specified below: (§63.752(b))
   (a) the name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility. (§63.752(b)(1))

(b) For each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements for semi-aqueous cleaning solvents used for flush cleaning operations: (§63.752(b)(2))
1. The name of each cleaning solvent used; and(§63.752(b)(2)(i))
2. All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements. (§63.752(b)(2)(ii))
3. Annual records of the volume of each solvent used, as determined from facility purchase records or usage records. (§63.752(b)(2)(iii))

(2) For each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in §63.744(b)(1), but does comply with the vapor pressure requirement in §63.744(b)(2): (§63.752(b)(3))
(a) The name of each cleaning solvent used: (§63.752(b)(3)(i))
(b) The composite vapor pressure of each cleaning solvent used: (§63.752(b)(3)(ii))
(c) All vapor pressure test results, if appropriate, data and calculations used to determine the composite vapor pressure of each cleaning solvent; and (§63.752(b)(3)(iii))
(d) The amount (in gallons) of each cleaning solvent used each month at each operation. (§63.752(b)(3)(iv))

(3) For each cleaning solvent used for exempt hand-wipe cleaning operations specified in §63.744(e) that does not conform to the vapor pressure or composition requirements of §63.744(b): (§63.752(b)(4))
(a) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and (§63.752(b)(4)(i))
(b) A list of the exempt processes to which the cleaning operation applies. (§63.752(b)(4)(ii))

(4) For cleaning solvents subject to 10 CSR 10-5.295, maintain:
(a) a list of materials with corresponding water contents for aqueous and semi-aqueous hand-wipe cleaning solvents;
(b) a current list of cleaning solvents in use with their respective vapor pressure or, for blended solvents, VOC composite vapor pressure for all vapor pressure compliant hand-wipe cleaning solvents. This list shall include the monthly amount of each applicable solvent used; and
(c) a current list of exempt hand-wipe cleaning processes for all cleaning solvents with a vapor pressure greater than forty-five (45) mmHg used in exempt hand-wipe cleaning operations. This list shall include the monthly amount of each applicable solvent used.

Monitoring:

1) Compliance with the hand-wipe cleaning solvent approved composition list specified in 63.744(b)(1) for hand-wipe cleaning solvents shall be demonstrated using data supplied by the manufacturer of the cleaning solvent. The data shall identify all components of the cleaning solvent and shall demonstrate that one of the approved composition definitions is met (63.750(a)).
2) The composite vapor pressure of hand-wipe cleaning solvents used in a cleaning operation subject to this subpart shall be determined as follows (63.750(b)(1)):

a. For single- component hand-wipe cleaning solvents, the vapor pressure shall be determined by using MSDS or other manufacturer's data, standard engineering reference texts, or other equivalent methods (63.750(b)(1).

b. The composite vapor pressure of a blended hand-wipe solvent shall be determined by quantifying the amount of each organic compound in the blend using manufacturer's supplied data or a gas chromatographic analysis in accordance with ASTM E 260-91 (incorporated by reference as specified in 63.14 of subpart A of this part) and by calculating the composite vapor pressure of the solvent by summing the partial pressures of each component. The vapor pressure of each component shall be determined using manufacturer's data, standard engineering texts or other equivalent methods. The following equation shall be used to determine the composite vapor pressure (63.750(b)(2)):

$$PP_c = \sum_{i=1}^{n} \frac{(W_i)(VP_i)/MW_i}{\frac{W_w}{MW_w} + \sum_{e=1}^{n} \frac{W_e}{MW_e} + \sum_{i=1}^{n} \frac{W_i}{MW_i}}$$

Where:
W_i = Weight of the "i"th VOC compound, grams.
W_w = Weight of water, grams.
W_e = Weight of non-HAP, nonVOC compound, grams.
MW_i = Molecular weight of the "i"th VOC compound, g/g-mole.
MW_w = Molecular weight of water, g/g-mole.
MW_e = Molecular weight of exempt compound, g/g-mole.
PP_c = VOC composite partial pressure at 20 °C, mm Hg.
VP_i = Vapor pressure of the "i"th VOC compound at 20 °C, mm Hg.(§63.750(b))

Reporting:

(1) Each owner or operator of a cleaning operation shall submit the following information:

(a) Semiannual reports occurring every six (6) months that identify:

1. Any instance where a non-compliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation;
2. A list of any new cleaning solvents used for hand-wipe cleaning in the previous six (6) months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements; and
3. If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.
4. All deviations of the housekeeping measures of 40 CFR Part 63, Subpart GG (Operational Limitations 1 through 3) must be included in the semi-annual report and the annual compliance certification and

~~must be reported to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 at least semi-annually. All deviations from the housekeeping measures must be included in the semi-annual monitoring report and the annual compliance certification.~~

It seems that the two sentences are requesting the same thing—if I am misinterpreting this need to know. What about annual reports going to EPA—this reads that you just have to send them to DNR only—may confuse some people? Needless to say—this is a very complex subject, but I do want to make sure I am not overlooking something.

EU0040
Cold Cleaners

		FEDERAL		
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	DESCRIPTION (for information only, this does not create any permit requirements)
CC-STL-01	CC-STL-01A	X	NA	Plant wide cold cleaners greater than 1 gal and 1 ft^2 surface area
CC-STL-01	CC-102-01	X	NA	Cold cleaner for hydraulic equipment
CC-STL-01	CC-105-01	NA	#6180	Cold cleaner for electronics only (Moving to 101)
CC-STL-01	CC-221-01	NA	#6114	Cold cleaner for electronics only
CC-101-01	CC-101-03	X	NA	Cold cleaner used for tube cleaning

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0040-001

10 CSR 10–5.300
Control of Emissions from Solvent Metal Cleaning

Emission Limitations:

(1) Operating procedures (section (5)(A) Cold Cleaners):
- (a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
- (b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
- (c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until

trained service personnel are able to restore operation within the established parameters.

(d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.

(e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the director's approval) and in accordance with 10 CSR 25, as applicable.

(f) Waste solvent shall be stored in closed containers only.

(2) Equipment specifications(section (4)(A) Cold Cleaners):

(a) After September 30, 1998

1. The cold cleaning solvent vapor pressure shall not exceed 2.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless the cold cleaner is used for carburetor cleaning.
2. The cold cleaning solvent vapor pressure shall not exceed 7.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) for cold cleaners used for carburetor cleaning.

(b) After April 1, 2001

1. The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless the cold cleaner is used for carburetor cleaning.
2. The cold cleaning solvent vapor pressure shall not exceed 5.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) for cold cleaners used for carburetor cleaning.

(c) Exemptions under (4) (A) 3. may apply.

(d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) and (b) above and is approved by the director.

(e) Each cold cleaner will have a cover which will prevent the escape of solvent vapors while in the closed position or enclosed reservoir which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.

(f) When one (1) or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system.)

1. The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
2. The solvent is agitated.
3. The solvent is heated.

(g) A drainage facility allowing parts to drain while the cover is closed is required.

(h) If an internal drainage facility as in (g) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.

(i) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
(j) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment.
(k) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one (1) of the following control devices:
1. A freeboard ratio of at least 0.75
2. Water cover (solvent must be insoluble in and heavier than water)
3. Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the director prior to use.

(3) Operator and Supervisor Training (section (6):
(a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
(b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
(c) Persons who operate a cold cleaner shall receive refresher training at least once each twelve (12) months.

Record Keeping:

(1) For cold cleaners subject to a) (2) (a) or (b) the following records for each sale of cold cleaning solvent shall be maintained and retained for two (2) years:
(a) The name and address of the solvent supplier
(b) The date of purchase
(c) The type of solvent
(d) The vapor pressure of the solvent in mmHg at 20°C (68°F)

(2) A record shall be kept of the cold cleaner training for each employee and shall be retained for two (2) years.

(3) Monthly records of the following shall be kept for a period of two (2) years:
(a) Solvent types and amount purchased
(b) Types and amounts of solvent containing waste material:
1. Transferred to a contract reclamation service or disposal facility
2. Distilled on the premises
(c) Maintenance and repair logs for the cold cleaner and any associated control equipment

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the vapor pressure limit set under Emission Limitations (2) in 10 CSR 10-5.300.

Permit Condition EU0040-002
10 CSR 10-6.060 ***Air Construction Permits***

1) Requirements of Construction Permit Number: #6180 (Parts Cleaner for Electronic Parts)

Emission Limitations:

Solvents are limited to N-methyl pyrrolidone or an aliphatic hydrocarbon which has been pre-approved by the St. Louis County Air Pollution Control Program Manager (such as Axarel 2200 or Micropure CDF).

Record Keeping:

Maintain monthly records showing by type of solvent the volume and weight of each material added to the unit.

Monitoring:

None

Reporting:

None

2) Requirements from Construction Permit Number: #6114 (Parts Cleaner for Electronic Parts)

Emission Limitations:

The operation is limited to 5,500 pounds of solvent on a twelve (12) month rolling average.

Record Keeping:

Maintain monthly records showing the volume and weight of each material added to the unit and the twelve (12) month rolling average.

Monitoring:

None

Reporting:

If the Record Keeping Requirements show that the Emission Limitations have been exceeded, St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, shall be notified by the next working day.
This notification is not required to be certified by a responsible official.

EU0050 Spray Gun Cleaning Operations

		FEDERAL	

EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	2) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Spray Gun Cleaning Operations	DESCRIPTION (for information only, this does not create any permit requirements)
BF-STL-02	CC-STL-01B	NA	X	Plantwide spray gun cleaning

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0050-001
10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG ***Aerospace Manufacturing and Rework Facilities NESHAP – Spray Gun Cleaning***

Emission Limitations:

(1) Housekeeping measures

(a) Operators shall place aerospace production cleaning solvent-laden cloth, paper, or other absorbent applicators used for cleaning in closed containers (such as plastic bags or step cans with the lids down) before leaving their work area. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.

(b) Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers (such as flip-top or squirt bottles with small openings, safety cans or drums with closed bungs).

(c) Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

(2) Spray gun cleaning

(a) Each owner or operator of a new or existing spray gun cleaning operation shall use one or more of the techniques, or their equivalent, specified in this section. Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below de minimis levels specified in 63.741 (f) are exempt from these requirements.

1. Enclosed Systems. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the cleaning solvent through the gun. If leaks are found during the monthly inspection required in 63.751 (a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued.
2. Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
3. Disassembled spray gun cleaning. Disassemble the spray gun and clean the components in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall

remain closed during the soaking period and when not inserting or removing components.

4. Atomizing cleaning. Clean the spray gun by forcing the cleaning solvent through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.

Record Keeping:

(1) A record of all leaks from enclosed spray gun cleaners that includes for each leak found:
  (a) Source identification
  (b) Date leak was discovered
  (c) Date leak was repaired

(2) Each owner or operator using an enclosed spray gun cleaner shall keep records of the visual inspections.

Monitoring:

(1) Each owner or operator using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks associated with each enclosed spray gun cleaner system at least once per month. Each inspection shall occur while the system is in operation.

Reporting:

(2) Each owner or operator of a cleaning operation shall submit the following information:
  (a) Semiannual reports occurring every six (6) months.
  (b) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards.

EU0060
Coating Lines

		FEDERAL				STATE/	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit
CL-002-01	SB-002-01	X	X	NA	#1780	X	Large spray booth (production parts)
AS-STL-01	SB-002-04	NA	NA	NA	NA	X	Booth for various activities (adhesive/sealant)
CL-002-02	SB-002-06	NA	X	NA	NA	NA	Spray booth (maintenance) (sanding)
CL-027-01	SB-027-01	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-02	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-03	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-04	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-027-01	SB-027-05	X	X	NA	NA	X	Paint booth (mostly production) (some sanding)
CL-029-01	SB-029-01	X	X	NA	#6259	X	Adhesive bonding coating line
CL-029-02	SB-029A-02	X	X	NA	#5739	X	Spray booth (mostly QA/QC) (possible production)
CL-048-01	SB-048-01	X	X	NA	#3221	X	Paint booth (aerospace production)

		FEDERAL				STATE/	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit
CL-048-01	SB-048-02	X	X	NA	#3275	X	Paint booth (aerospace production)
CL-048-01	SB-048-03	X	X	NA	#3276	X	Paint booth (aerospace production)
CL-048-01	SB-048-04	X	X	NA	#3277	X	Paint booth (aerospace production)
CL-048-01	SB-048-05	X	X	NA	#6324	X	Paint booth (aerospace production)
CL-048-01	SB-048-06	X	X	NA	#6447	X	Paint booth (aerospace production)
CL-060-01	SB-060-01	NA	X	NA	NA	NA	Spray booth (cans of primer) (research and development)
CL-063-01	SB-063-01	X	X	NA	#1490	X	Spray booth (paint & others) (aerospace production)
CL-066-01	SB-066-01	X	X	NA	#1369	X	Spray booth (aerospace production) (painting and sanding)
CL-066-01	SB-066-02	NA	X	NA	#1366	NA	Spray booth (research and development)
CL-101-01	SB-101-25	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)

		FEDERAL				STATE/	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit
CL-101-01	SB-101-26	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-27	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
AS-STL-01	SB-101-29	NA	NA	NA	#1624	X	Spray booth (sealants and adhesives)
CL-101-01	SB-101-30	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-39	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-01	SB-101-44	NA	NA	NA	NA	NA	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-02	SB-101-02	X	X	NA	#1754	X	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-33	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)

		FEDERAL				STATE/	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit
CL-101-02	SB-101-40	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-02	SB-101-40A	X	X	NA	NA	X	Spray booth (aerospace production) (painting and sanding)
CL-101-03	SB-101-04	NA	X	NA	#5988	NA	Spray booth (research and development)
CL-101-03	SB-101-41	X	X	NA	#1621	X	Spray booth (research and development) (could be used for production)
CL-101-03	SB-101-06	X	X	NA	#1473	X	Spray booth (mock-up & tooling) (could be used for production)
CL-101-03	SB-101-43	NA	X	NA	#1474	NA	Spray booth (robotic & hand applied) (research and development)
CL-101-03	SB-101-35	X	X	NA	#1475	X	Spray booth (robotic & hand applied) (research and development) (could be used for production)
CL-101-03	SB-101-45	NA	X	NA	#6208	NA	Robotic Sprayer (research and development)
CL-102-01	SB-102-01	NA	X	NA	#1207	NA	Bench spray booth (research & development)

		FEDERAL				STAT E/	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from Industrial Processes	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit
CL-102-01	SB-102-03	X	X	NA	#1042	X	Paint booth (aerospace) (mostly research and development) (some aerospace production)
CL-245-02	SB-245-02	NA	X	NA	#1709	NA	Paint booth (maintenance)
CL-248-01	SB-248-01	NA	X	NA	#1753	NA	Paint booth (mock-up) (research and development)
NONE	SB-101-10	NA	X	NA	#1668	NA	Spray Booth (Plasma spray coater) (research and development)
NONE	SB-101-34	NA	X	NA	NA	NA	Spray booth (Arc Spray)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Permit Condition EU0060-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
Aerospace Manufacturing and Rework facilities NESHAP – Primers and Topcoats

Emission Limitations:

(1) Primers:
(a) shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
(b) shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
(c) The VOC content may be used as a surrogate for the organic HAP content.
(2) Topcoats:
(a) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

(b) shall be limited to a organic HAP content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
(c) The VOC content may be used as a surrogate for the organic HAP content.

(3) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.
(4) Inorganic HAP Control. The airflow shall be exhausted through a dry particulate filter system that meets the limits in 40 CFR 63.745 (g) by Method 319 when primers or topcoats containing inorganic HAPs are being sprayed.
(5) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG are not covered by this rule.
(6) Work practice standards
(a) Primers and topcoats shall be handled in a manner to minimize spills.
(b) Primers and topcoats shall be applied in a manner consistent with the requirements of this rule.

Record Keeping:

(1) Primers and Topcoats
(a) Record the name and VOC content as applied of each primer and topcoat used in production areas.
(b) For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.
(c) If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).

(2) Inorganic HAP Control
(a) Record the pressure drop (either electronically or manually) once each operating shift that inorganic HAP containing primer or topcoat is spray applied.
1. The pressure drop records are deemed to be complete if 95% of the readings are recorded for all of the booths subject to this rule in any six (6) month period. If the last reading recorded correctly prior to any group of missed readings and the first reading recorded correctly after the same group of missed readings are both below the pressure drop limit, the missed readings are deemed to be below the pressure drop limit.
2. For this provision, a shift is an 8 hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).

Monitoring:

(1) For dry filters, install differential pressure gauge across filter bank. Continuously monitor the pressure drop when inorganic HAP containing primers and topcoats are spray applied and take corrective action if pressure drop falls outside the manufacturer's limits.

Reporting:

(2) Every six (6) months:
(a) Report all times when a primer or topcoat application containing inorganic HAP was not immediately shut down when the pressure drop across a dry

particulate filter was outside limit(s) as specified by the filter or booth manufacturer.

(b) Report any times where primers or topcoats exceeded the appropriate VOC or organic HAP limit.

(c) If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards.

(3) Annually: (Report) the number of times the pressure drop was outside the limit(s) as specified by the filter or booth manufacturer.

Permit Condition EU0060-002

10 CSR 10-5.050
Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitations:

No person shall cause, suffer, allow or permit the emission of particulate matter in any one (1) hour to exceed the concentration shown in Table II of the rule for the process weight rate associated with that source.

Record Keeping:

The one-time compliance calculation based on the particulate concentration of particulates being emitted from each booth must be kept as a record.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of particulate emission limits required by Emission Limitations.

Permit Condition EU0060-003

10 CSR 10-6.060
Air Construction Permits

1) Requirements of the Construction Permit Numbers: #'s 1490, 1624, 1621, 1473, 1474, 1475, 1207, 1042, 1709, 1668

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

2) Requirements of the Construction Permit Number: #1780 (Large Parts Paint Booth – Operating Permit #5771)

Emission Limitations:

Booth is limited to seven thousand (7,000) gallons of aerospace topcoats, primers and specialty coatings per twelve (12) month rolling period.

Record Keeping:

(a) Monthly records of gallons of aerospace topcoats, primers and specialty coating used in this booth that demonstrate compliance with the above emission limitation.
(b) Records that show compliance with 10-5.330.
(c) Records that show the twelve (12) month rolling average of gallons of aerospace topcoats, primers and specialty coatings used.
(d) Records shall be maintained for a period of five (5) years.
(e) Records shall be made available to St. Louis County Air Pollution Control Program Manager upon request.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the gallon limit under Emission Limitations.

2) Requirements of the Construction Permit Number: #6259 (Paint and Adhesive Booth)

Emission Limitations:

VOC and HAP emissions are limited to 1.75 tons per year from aerospace topcoats, primers and specialty coatings on a 12 month rolling average.

Record Keeping:

(a) Permittee shall maintain monthly records of aerospace topcoats, primers and specialty coatings usage and VOC and HAP content per gallon, on site, for the latest twenty-four (24) month period, which clearly demonstrates compliance with the Emission Limitation above.
(b) Records shall be complete within ten (10) days of the end of each month.

Monitoring:

None

Reporting:

If the records indicate that a violation of the emission limitation or standards of this permit has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day. This notification is not required to be certified by a responsible official.

2) Requirements of the Construction Permit Number: #5739 (Paint Spray Booth)

Emission Limitations:

Emissions of VOC and HAP from aerospace topcoats, primers and specialty coatings are limited to three and two tenths (3.2) tons per year on a twelve month (12) rolling average.

Record Keeping:

(1) Monthly records must be maintained that meet the following requirements:
  (a) Demonstrate the status of compliance with the above emission limitation.
  (b) Records must be complete within ten (10) days of the end of each month.
  (c) Records that indicate the per twelve (12) month rolling average of VOC and HAP emissions from the aerospace topcoats, primers and specialty coatings used.
  (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

Should records indicate a violation of the above emission limitation, 10 CSR 10-5.330, or 40 CFR Part 63, subpart GG has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day.

This notification is not required to be certified by a responsible official.

2) Requirements of the Construction Permit Number: #'s 3221, 3275, 3276, 3277, 6324, 6447 (Building 48 Spray Paint Booth)

Emission Limitations:

(1) Emissions of VOCs from aerospace topcoats, primers and specialty coatings are limited to less than eighteen (18) tons per year, on a twelve month rolling average.
(2) Emissions of any individual HAP from aerospace topcoats, primers and specialty coatings are limited to less than ten (10) tons per year, on a twelve month rolling average.
(3) Emissions of any combination of HAPs from aerospace topcoats, primers and specialty coatings are limited to less than eighteen (18) tons per year, on a twelve month rolling average.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
  (a) The amounts utilized.
  (b) The VOC and HAP(s) content of each material.
  (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
  (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

Should the records indicate that a violation of any limit established in the above Emission Limitations has occurred, the permittee shall notify the St. Louis County Department of Health Air Pollution Control Program Manager by no later than the next working day.

This notification is not required to be certified by a responsible official.

6) Requirements of the Construction Permit Number: #1366 (Operating Permit #5331 Special Project Lab - Spray Paint Booth)

Emission Limitations:

Unit is limited to 0.62 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,080 hours of operation per twelve (12) month rolling average.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
   (a) The amounts utilized.
   (b) The VOC content of each material.
   (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
   (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

7) Requirements of the Construction Permit Number: #1369 (Spray Paint Booth Building 66 – Operating Permit # 5368)

Emission Limitations:

Unit is limited to 2 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,080 hours of operation per twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
   (a) The amounts utilized.
   (b) The VOC and HAP(s) content of each material.
   (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
   (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30)

days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

2) Requirements of the Construction Permit Number: #1754 (Paint Spray Booth Building- Operating Permit #5737)

Emission Limitations:

Unit is limited to 12.5 tons VOC emitted from topcoats, primers and specialty coatings per year or 2,000 hours of operation per twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
   (a) The amounts utilized.
   (b) The VOC content of each material.
   (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
   (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC limit required by Emission Limitations.

2) Requirements of the Construction Permit Number: #5988 (Paint Spray Booth)

Emission Limitations:

Topcoats, primers and specialty coatings usage is limited to 2,000 gallons per twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
   (a) The amounts utilized.
   (b) The VOC and HAP(s) content of each material.
   (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
   (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the topcoats, primers and specialty coatings usage limit required by Emission Limitations.

2) Requirements of the Construction Permit Number: #6208 (Robotic Paint Spray Booth)

Emission Limitations:

Topcoats, primers and specialty coatings usage is limited to 39,990 pounds of VOC emitted per year, on a twelve (12) month rolling average.

Record Keeping:

(1) Recordkeeping to show daily compliance with 10 CSR 10-5.330.
   (a) Monthly records of topcoats, primers and specialty coatings usage and VOC content, as well as the twelve (12) month rolling average shall be maintained on site.
   (b) Monthly records shall be made available to St. Louis County Program Manager or his designated agent at any reasonable time.

Monitoring:

None

Reporting:

Should records indicate that a violation of 10 CSR 10-5.330, or the Emission Limitation above has occurred, the permittee must notify St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later that the next working day.

This notification is not required to be certified by a responsible official.

2) Construction Permit Number: #1753 (Large Paint Spray Booth Building 248 – Operating Permit # 5741)

Emission Limitations:

This unit is limited to 4.6 tons of VOC emissions from topcoat, primer and specialty coating emissions per year or 2,000 hours of operation twelve (12) month rolling period.

Record Keeping:

(1) Monthly and per twelve (12) month rolling period records of all aerospace topcoats, primers and specialty coatings utilized in the paint booths shall be maintained. These records shall include:
   (a) The amounts utilized.
   (b) The VOC content of each material.
   (c) Monthly calculations which demonstrate compliance with the limits established in the above Emissions Limitations.
   (d) Records must be maintained for the latest sixty (60) month period.

Monitoring:
None

Reporting:
The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any exceedance of VOC limit required by Emission Limitations.

Permit Condition EU0060-004

10 CSR 10-5.295
Control of Emissions From Aerospace Manufacture and Rework Facilities

Emission Limitations:
(1) Specialty coatings shall be limited to VOC contents expressed in Table I of this rule. (See appendix 1)
(2) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
(3) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

Record Keeping:
(1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
(2) The permittee shall record coating usage on a monthly basis.
(3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

Monitoring:
None

Reporting:
The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after discovery that the VOC content limit set in Emission Limitations.

EU0070
Coating Lines Alternate Operating Scenario A

		FEDERAL				STAT	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.050: Restriction of Emission of Particulate Matter from	3) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	4) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit requirements)
CL-002-02	SB-002-06	X	X	NA	NA	X	Spray booth (maintenance) (sanding)
CL-060-01	SB-060-01	X	X	NA	NA	X	Spray booth (cans of primer) (research and development)
CL-066-01	SB-066-02	X	X	NA	#1366	X	Spray booth (research and development)
AS-STL-01	SB-101-29	X	X	NA	#1624	X	Spray booth (sealants and adhesives)
CL-101-01	SB-101-03	X	X	NA	NA	X	Lab hood for conformal coating of parts
CL-101-01	SB-101-44	X	X	NA	NA	X	Spray booth (developers: ex: KPR Resist) (not primer or topcoat)
CL-101-03	SB-101-04	X	X	NA	#5988	X	Spray booth (research and development)
CL-101-03	SB-101-43	X	X	NA	#1474	X	Spray booth (robotic & hand applied) (research and development)
CL-101-03	SB-101-45	X	X	NA	#6208	X	Robotic sprayer (research and development)
CL-102-01	SB-102-01	X	X	NA	#1207	X	Bench spray booth (research & development)
CL-245-02	SB-245-02	X	X	NA	#1709	X	Paint booth (maintenance)
CL-248-01	SB-248-01	X	X	NA	#1753	X	Paint booth (mock-up) (research and development)

NONE	SB-101-10	X	X	NA	#1668	X	Spray booth (Plasma spray coater) (research and development)
NONE	SB-101-34	X	X	NA	NA	X	Spray booth (arc spray)

X = Applicable NA = Not Applicable

DESCRIPTION OF ALTERNATE SCENARIO

This alternate scenario allows these booths to be used for spray coating application of production parts with aerospace primers, topcoats and specialty coatings. These booths are currently used for an activity that is exempt from some or all of the requirements associated with aerospace production booths such as research and development, maintenance, or arc spray. The coating of aerospace production parts in any of these booths with aerospace primers, topcoats, and specialty coatings will subject these booths to the applicable requirements listed above.

COMPLIANCE REQUIREMENTS

Applicable requirements are the same as listed above under Coating Lines.

EU0080
Fugitive Painting

		FEDERAL		STATE	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Primers and Topcoats	2) 10 CSR 10-5.330: Control of Emissions from Industrial Surface Coating Operations	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacturing and Rework Facilities	DESCRIPTION (for information only, this does not create any permit requirements)
BF-STL-01	BF-STL-01	X	NA	X	Plantwide Fugitive Painting

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Permit Condition EU0080-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
Aerospace Manufacturing and Rework facilities NESHAP – Primers and Topcoats

Emission Limitations:

(1) Primers:

(a) shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

(b) shall be limited to an organic HAP content of 350 grams per liter or 2.9 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.

(c) The VOC content may be used as a surrogate for the organic HAP content.

(2) Topcoats:
   (a) shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
   (b) shall be limited to a organic HAP content of 420 grams per liter or 3.5 pounds per gallon (organic HAP content is measured less water and exempt solvent) as applied.
   (c) The VOC content may be used as a surrogate for the organic HAP content.

(3) Averaging (as described in 63.745(e) (2) & 750 (d)) can be used to meet the Primer and Topcoat limits.

(4) The usage of specialty coatings as defined in 40 CFR 63 Subpart GG is not covered by this rule.

(5) Areas where it is not technically feasible to paint parts in a booth are not required to meet particulate control requirements of 63.745 (g)(1) through (g)(3). In addition to the exceptions listed in 63.745 (g)(i) through (g)(viii), the following operations are not feasible within a paint booth:
   (a) The part is too large to be painted in a booth.
   (b) The coatings are not spray applied.
   (c) The part would need to be removed from a fixture/tool to be painted in a booth.
   (d) Cycle time restrictions prior to subsequent operations make it time prohibitive to move the part to a paint booth.
   (e) Other operations where engineering analysis recommends the part be painted outside of a booth.

Record Keeping:

(1) Record the name and VOC content as applied of each primer and topcoat used in production areas.

(2) For low HAP content primers and topcoats record keeping complying with 63.752 (c)(3) may be used.

(3) If averaging is used to meet the primer and topcoat limits record keeping shall comply with 63.752 (c)(4).

Monitoring:

None

Reporting:

(1) Every six (6) months:
   (a) Report any times where primers or topcoats exceeded the appropriate VOC or organic HAP limit.
   (b) If the operations have been in compliance for the semiannual period, (provide) a statement that the operations have been in compliance with the applicable standards.

Permit Condition EU0080-002

10 CSR 10-5.295
Control of Emissions From Aerospace Manufacturing and Rework Facilities

Emission Limitations:

(1) Specialty coatings shall be limited to a VOC content as expressed in Table I of this rule. (See Appendix 1)
(2) Primers shall be limited to a VOC content of 350 grams per liter or 2.9 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.
(3) Topcoats shall be limited to a VOC content of 420 grams per liter or 3.5 pounds per gallon (VOC content is measured less water and exempt solvent) as applied.

Record Keeping:

(1) The permittee shall maintain a list of coatings in use with category and VOC content as applied.
(2) The permittee shall record coating usage on a monthly basis.
(3) The permittee shall maintain records of monthly volume-weighted average VOC content for each regulated coating type included in averaging for coating operations that achieve compliance through coating averaging under this rule.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of Emission Limitations.

EU0090
Combustion Sources

		FEDERAL			
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 60 Subpart D_c and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	2) 10 CSR 10-5.060: Refuse Not to be Burned in Fuel Burning Installations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	**DESCRIPTION** (for information only, this does not create any permit requirements)
CS-005-01	CS-005-02	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-03	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-01	CS-005-04	NA	X	#1321	Coal/natural gas/fuel oil boiler (76.4 MMBTU/hr)
CS-005-05	CS-005-05	NA	X	NA	Natural gas/fuel oil boiler (77.0 MMBTU/hr)
CS-048-01	CS-048-01	X	X	#6358	Natural gas boiler (25.1 MMBTU/hr)
CS-101-01	CS-101-01	NA	X	NA	Natural gas boiler (52.0 MMBTU/hr)
CS-101-01	CS-101-02	NA	X	NA	Natural gas boiler (52.0 MMBTU/hr)
CS-101-03	CS-101-03	NA	X	NA	Natural gas boiler {20.8 MMBTU/hr}
CS-101-03	CS-101-04	NA	X	NA	Natural gas boiler {20.8 MMBTU/hr}
CS-102-01	CS-102-01	NA	X	NA	Natural gas boiler {79.6 MMBTU/hr}
CS-102-02	CS-102-02	NA	X	NA	Natural gas boiler (33.476 MMBTU/hr)
CS-102-02	CS-102-03	NA	X	NA	Natural gas boiler {25.2 MMBTU/hr}
CS-110-01	CS-110-01	NA	X	#0865	Natural gas boiler (10.461 MMBTU/hr)
CS-110-01	CS-110-02	NA	X	#0865	Natural gas boiler (10.461 MMBTU/hr)
CS-111-01	CS-111-01	NA	X	#1332	Natural gas boiler (16.8 MMBTU/hr)
CS-111-01	CS-111-02	NA	X	#1332	Natural gas boiler (16.8 MMBTU/hr)
CS-STL-01	CS-STL-01A	NA	X	NA	Plantwide combustion (indirect natural gas)
CS-STL-01	CS-STL-01C	NA	X	NA	Plantwide combustion (propane)
CS-STL-01	CS-025-01	NA	X	NA	Natural gas boiler {8.5 MMBTU/hr}
CS-STL-01	CS-066-01	NA	X	NA	Natural gas boiler/FO back-up {6.3 MMBTU/hr}
CS-STL-	CS-066-	NA	X	NA	Natural gas boiler/FO back-up {6.3

		FEDERAL			
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 60 Subpart D_c and 10 CSR 10-6.070: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	2) 10 CSR 10-5.060: Refuse Not to be Burned in Fuel Burning Installations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	**DESCRIPTION** (for information only, this does not create any permit requirements)
CS-STL-01	CS-066-03	NA	X	NA	Natural gas boiler {6.3 MMBTU/hr}
CS-STL-01	CS-066-04	NA	X	NA	Natural gas boiler {6.3 MMBTU/hr}
CS-STL-01	CS-111-03	NA	X	#1333	Natural gas boiler (6.3 MMBTU/hr)
CS-STL-01	CS-221-01	NA	X	NA	Natural gas boiler (3.3475 MMBTU/hr)
CS-STL-01	CS-221-02	NA	X	NA	Natural gas boiler (3.3475 MMBTU/hr)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Permit Condition EU0090-001
10 CSR 10-6.070 and 40 CFR Part 60 Subpart D_c ***Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units***

Emission Limitations:

None

Record Keeping:

The permittee shall collect annual fuel consumption readings for the natural gas meter that includes the steam clean aircraft boiler. This consumption data includes natural gas consumption from other sources (i.e. hot water heaters). These records shall be maintained by the permittee for a period of two years.

Monitoring:

None

Reporting:

None

Permit Condition EU0090-002
10 CSR 10-6.060 ***Air Construction Permits***

1) ***Requirements of the Construction Permit Numbers: #0865, #1332, #1333 & #6358***

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

2) **Requirements of the Construction Permit Number: #1321**

Emission Limitations:

(1) The existing chain grate coal-fired boiler was removed.
(2) The maximum hourly heat input of the modified boilers while burning coal is limited as follows:
    (a) From April 1 to October 31 – 110.2 x 10^6 BTU/HR averaged over 24 hours.
    (b) From November 1 to March 31 – 122.4 x 10^6 BTU/HR averaged over 24 hours.
(3) The sulfur content of the coal burned shall not exceed one percent (1%).
(4) Sulfur dioxide emissions are limited to 217.5 pounds per hour, and 1.76 pounds per million BTUs of hourly heat input while burning coal.

(5) Nitrogen dioxide emissions are limited to 1.0 pounds per million BTU's of hourly heat input while burning coal.
(6) Emissions testing was performed (1/18/85).
(7) A post construction monitoring site for sulfur dioxide was established and operated for one (1) year.
(8) A plan was submitted (8/12/85) for assuring continuing compliance with the nitrogen dioxide emission limitation above.
(9) The ash content of the coal burned shall not exceed twelve (12) percent by weight.
(10) Alternate fuels can be burned. (Including: natural gas, fuel oil, and off-spec. jet fuel.)

Record Keeping:

(1) The permittee shall maintain monthly or daily as required records of the following:
    (a) amount of coal burned daily
    (b) sulfur content of the coal
    (c) ash content of the coal
    (d) heating value of the coal in BTU/lb
    (e) The maximum hourly heat input of the modified boilers while burning coal:
(2) Records shall be maintained for a sixty (60) month period.

Monitoring:

Test method contained in 10 CSR 10-6.040(1) (ASTM D (3177-75)) or other director-approved method should be used to determine compliance with sulfur content of coal.

Reporting:

(1) Monthly fuel usage and analysis reports shall be submitted to the local agency within 15 days of the end of each month, or as approved by the St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program . The reports shall include:
    (a) amount of coal burned daily
    (b) sulfur content of the coal
    (c) ash content of the coal
    (d) heating value of the coal in BTU/lb
    (e) These reports are not required to be certified by a responsible official.
(2) The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the Emission Limitations.

EU0100
Depainting Operations

		FEDERAL	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) & 2) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP	DESCRIPTION (for information only, this does not create any permit requirements)
MC-STL-01	MC-STL-01	X	Plantwide chemical depainting
NONE	DP-STL-01	X	Plantwide mechanical depainting

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Permit Condition EU0100-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
Aerospace Manufacturing and Rework Facilities NESHAP (When 7 or more completed aerospace vehicles are depainted in a calendar year and when 6 or less completed aerospace vehicles are depainted in a calendar year this does not apply)
10 CSR 10-6.075 and 40 CFR Part 63, Subpart A
General Provisions

Emission Limitations:

(1) On an average annual basis, no more than 26 gallons (or 190 pounds) of organic HAP containing chemical strippers per completed commercial aircraft depainted or no more than 50 gallons (or 360 pounds) of organic HAP containing chemical strippers per completed military aircraft depainted may be used for spot stripping and decal removal. (§63.746(b)(3))

(2) Nonchemical based depainting equipment shall be operated and maintained according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions, use substitute materials during the repair period, which minimize organic HAP emissions. Substitute materials can be used for no more than fifteen (15) days annually, unless such materials are organic HAP-free. (§63.746(b)(2))

(3) Depainting operations that generate airborne inorganic HAP emissions from dry media blasting must comply with §63.746 (b)(4)(i) through (v). (§63.746(b)(4))

(4) Mechanical and hand sanding operations are exempt from the requirements of §63.746 (b)(4). (§63.746(b)(5))

Record Keeping:

(1) General

(a) Record for all chemical strippers used in the depainting operation: (§63.752(e)(1))

1. The name of each chemical stripper(§63.752(e)(1)(i))
2. For spot stripping and decal removal, the volume of organic HAP containing chemical stripper or weight of organic HAP used, the annual average volume of organic HAP-containing stripper or weight of organic HAP used per aircraft, the annual number of aircraft stripped, and all data and calculations used. (§63.752(e)(6))

(2) Mechanical Depainting

(a) If dry media blasting equipment is used to comply with the organic HAP emission limit specified in 63.746(b)(1), record: (§63.752(e)(5))

1. The names and types of nonchemical based equipment; and
2. For periods of malfunction, (§63.752(e)(5)(i))
   a. The nonchemical method or technique that malfunctioned; (§63.752(e)(5)(i)(A))
   b. The date that the malfunction occurred; (§63.752(e)(5)(i)(B))
   c. A description of the malfunction; (§63.752(e)(5)(i)(C))
   d. The methods used to depaint aerospace vehicles during the malfunction period; (§63.752(e)(5)(i)(D))
   e. The dates that these methods were begun and discontinued; and (§63.752(e)(5)(i)(E))
   f. The date that the malfunction was corrected. (§63.752(e)(5)(i)(F))

Inorganic HAP Emissions. The permittee shall record the actual pressure drop (either electronically or manually) across the particulate filters once each shift in which the depainting process is in operation. *This log shall include the acceptable limit(s) of the pressure drop as specified by the filter manufacturer or in locally prepared operating procedures. (Since we don't currently use this it doesn't matter to us, but might want to add the log requirements to more closely track the regulations.)*

(b) (§63.752(e)(7))

1. For this provision, a shift is an 8 hour period (12:00 midnight to 8:00 AM, 8:00 AM to 4:00 PM, and 4:00 PM to 12:00 midnight).

Monitoring:

None

Reporting:

(1) Submit a semiannual report that identifies: (§63.753(d)(1))

(a) For periods of malfunctions of dry media blasting equipment: (§63.753(d)(1)(vi))

1. The nonchemical method or technique that malfunctioned; (§63.753(d)(1)(vi)(A))
2. The date that the malfunction occurred; (§63.753(d)(1)(vi)(B))
3. A description of the malfunction; (§63.753(d)(1)(vi)(C))
4. The methods used to depaint aerospace vehicles during the malfunction period; (§63.753(d)(1)(vi)(D))

5. The dates that these methods were begun and discontinued; and (§63.753(d)(1)(vi)(E))
6. The date that the malfunction was corrected; (§63.753(d)(1)(vi)(F))

(b) All periods where a nonchemical depainting operation subject to §63.746 (b)(2) and (b)(4) for the control of inorganic HAP emissions was not immediately shut down when the pressure drop was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures; (§63.753(d)(1)(vii))

(c) A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed or depainting for each new aircraft model being depainted; and(§63.753(d)(1)(vii))

(d) If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards. (§63.753(d)(1)(ix))

(2) Submit an annual report that identifies: (§63.753(d)(2))

(a) The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in §63.746 (b)(3); and(§63.753(d)(2)(i))

(b) The number of times the pressure drop limit(s) for each filter system were outside the limits specified by the filter or booth manufacturer or in locally prepared operating procedures. (§63.753(d)(2)(ii))

EU0110
Emergency Generators

		FEDERAL	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.180: Emission of Visible Air Contaminants From Internal Combustion Engine	DESCRIPTION (for information only, this does not create any permit requirements)
NONE	EG-002-01	X	Diesel emergency generator
NONE	EG-002-02	X	Diesel emergency generator (in shed)
NONE	EG-009-01	X	Diesel emergency generator
NONE	EG-009-02	X	Diesel emergency generator (for pump)
NONE	EG-020-01	X	Diesel emergency generator
NONE	EG-026-01	X	Diesel emergency generator (for fire pump)
NONE	EG-029-01	X	Natural gas emergency generator
NONE	EG-029A-02	X	Natural gas emergency generator (200HP)
NONE	EG-033-01	X	Diesel emergency generator
NONE	EG-034-01	X	Diesel emergency generator
NONE	EG-045-01	X	Diesel emergency generator
NONE	EG-056-01	X	Diesel emergency generator (50 HP)
NONE	EG-064-01	X	Natural gas emergency generator (250 HP @ 1880 RPM)
NONE	EG-066-01	X	Natural gas emergency generator (250 HP)
NONE	EG-066-02	X	Diesel emergency generator (for fire pump)
NONE	EG-067-01	X	Diesel emergency generator
NONE	EG-101-01	X	Diesel emergency generator
NONE	EG-101A-01	X	Natural gas emergency generator
NONE	EG-102-01	X	Diesel emergency generator
NONE	EG-103-01	X	Diesel emergency generator
NONE	EG-106-01	X	Diesel emergency generator
NONE	EG-107-01	X	Diesel emergency generator
NONE	EG-110-01	X	Natural gas emergency generator
NONE	EG-111-01	X	Diesel emergency generator
NONE	EG-122-01	X	Diesel emergency generator
NONE	EG-220-01	X	Diesel emergency generator
NONE	EG-HQ-01	X	Diesel emergency generator

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0110-001
10 CSR 10-5.180 ***Emission of Visible Air Contaminants From Internal Combustion Engine***

Emission Limitations:

No person shall cause or permit the emission of visible air contaminants from any internal combustion engine for more than ten (10) consecutive seconds at any one (1) time. Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements of this regulation, the provisions of this regulation shall not apply.

Record Keeping:

None

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Department of Health Air Pollution Control Section, 111 South Meramec, Clayton, MO, 63105 no later than thirty (30) days after the discovery of any exceedance of visible air contaminants requirements of Emission Limitations.

EU0120
Handling Of Hazardous Waste

		FEDERAL	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Hazardous Waste Handling	**DESCRIPTION** (for information only, this does not create any permit requirements)
NONE	HW-STL-01	X	Plantwide handling of hazardous waste

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0120-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
Aerospace Manufacturing and Rework Facilities NESHAP – Hazardous Waste Handling

Emission Limitations:

All waste that contains HAP, but is not subject to RCRA standards, shall be handled and transferred to or from containers, vats, vessels, and piping systems in such a manner that minimizes spills.

Record Keeping:

None

Monitoring:

None

Reporting:

None

EU0130
Hazardous Waste Shelter

		FEDER	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart DD and 10 CSR 10-6.075: Off-Site Waste NESHAP	DESCRIPTION (for information only, this does not create any permit requirements)
NONE	MS-027-04	N/A	Hazardous waste shelter

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

N/A

EU0140
Chemical Milling Maskants

		FEDERAL			STAT	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart GG and 10 CSR 10-6.075: Aerospace Manufacturing and Rework Facilities NESHAP – Chemical Milling Maskant	2) 10 CSR 10-5.330: Control of Emissions From Industrial Surface Coating Operations	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	1) 10 CSR 10-5.295: Control of Emissions From Aerospace Manufacture and Rework	DESCRIPTION (for information only, this does not create any permit requirements)
ML-051-01	ML-051-01	X	NA	#6326	X	Large waterbased maskant line
ML-051-01	SB-051-01	X	NA	#6326	X	Maskant spray booth
NONE	ML-051-02	X	NA	NA	X	Small wasterbased maskant line

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Permit Condition EU0140-001

10 CSR 10-6.075 and 40 CFR Part 63, Subpart GG
Aerospace Manufacturing and Rework Facilities NESHAP – Chemical Milling Maskant

Emission Limitations:

(1) VOC emissions from chemical milling maskants shall be limited to no more than 160 grams of organic HAP per liter (1.3 lb/gal).
  (a) This limit does not apply to:
    1. Touch-up of scratched surfaces or damaged maskant; or
    2. Touch-up of trimmed edges.
(2) The permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

Record Keeping:

Chemical milling maskant purchasing records including monthly amount purchased and VOC content shall be maintained.

Monitoring:

None

Reporting:

(1) Semi-Annual Report
(2) Annual Report

Permit Condition EU0140-002

10 CSR 10-6.060
Air Construction Permits

1) Requirements of the Construction Permit Number: #6326

Emission Limitations:

Emissions are limited, on a twelve (12) month rolling average, to eight and one tenth (8.1) ton each of VOC and HAP.

Record Keeping:

(1) Monthly records of all chemical milling maskants utilized in the maskant operations, including:
  (a) The amounts of each material
  (b) The VOC and HAP content of each material
  (c) Calculations, which, demonstrate compliance with the emission limitation above.
  (d) Records showing the twelve month rolling average of emissions of VOC and HAP.
  (e) The records for the latest sixty (60) month period.

Monitoring:

None

Reporting:

Should the records indicate that a violation of any of the limits established in the emission limitation above has occurred, the permittee shall notify the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, by no later than the next working day.

This notification is not required to be certified by a responsible official.

Permit Condition EU0140-003

10 CSR 10-5.295

Control of Emissions From Aerospace Manufacture and Rework Facilities

Emission Limitations:

(1) VOC emissions from chemical milling maskants shall be limited to no more than 160 grams of organic HAP per liter (1.3 lb/gal).

(a) This limit does not apply to:

1. Touch-up of scratched surfaces or damaged maskant; or
2. Touch-up of trimmed edges.

(2) The permittee shall conduct the handling and transfer of chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

Record Keeping:

Purchasing records including monthly amount purchased and VOC content shall be maintained.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the VOC content requirements in Emission Limitations.

EU0150

Particulate Emitting Sources

		FEDERAL		
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.050 Restriction of Emission of Particulate Matter From Industrial Processes	2) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	DESCRIPTION (for information only, this does not create any permit requirements)
NONE	GB-027-02	X	NA	Walk-in grit blaster

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0150-001

10 CSR 10-5.050
Restriction of Emission of Particulate Matter From Industrial Processes

Emission Limitations:

(1) Units must meet one of the following limits:
(a) The emission rate of 17.199 lb particulate matter/hour; or
(b) The concentration of 0.100 grains/scf.

Record Keeping:

Maintain a copy of one-time compliance demonstration calculations.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than ten (30) days after the discovery of any exceedance of the particulate matter emission limit required under Emission Limitation.

EU0160
Chromic Acid Anodize Tank

		FEDER	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart N and 10 CSR 10-6.075: Chrome NESHAP	DESCRIPTION (for information only, this does not create any permit requirements)
PT-027-05	IT-027-08A	X	Immersion tank 9 in the aluminum line

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0160-001
10 CSR 10-6.075 and 40 CFR Part 63 Subpart N ***Chrome NESHAP***

Emission Limitations:

The surface tension of the tank shall be maintained at or below 45 dynes/cm. The permittee shall maintain and follow an operation and maintenance plan.

Record Keeping:

The hours of operation for the chrome anodize tank shall be recorded.

Monitoring:

(1) The surface tension shall be periodically monitored based on the alternate monitoring schedule from Table 2 of the operation and monitoring plan:

Table 2 Alternative Monitoring Requirements

Inspection Level	**Time of Continuous Anodize Tank Operation at Less Than or Equal to 45 dynes/cm (1), (3)**	**Frequency of Surface Tension Readings (4)**	**Actions Required Based on Results of Surface Tension Reading**
Level 1	0 to 40 hours	Twice a day	If the surface tension readings are less than or equal to 45 dynes/cm after 40 hours of operation, then proceed to Inspection Level 2.
Level 2	41 to 80 hours	Once a day	If the surface tension readings are less than or equal to 45 dynes/cm after 80 hours of operation, then proceed to Inspection Level 3.
Level 3	Greater than 80 hours	Once a week	If the surface tension readings are less than or equal to 45 dynes/cm, then remain at Inspection Level 3. (2)

Notes:

{1} The time of continuous anodize tank operation is defined as accumulated time when the chromic acid anodize current is flowing.

{2} If any reading is greater than 45 dynes/cm, then shut down the chromic acid anodize tank operation.

{3} If the tank operation exceeds 40 hours of operation in one week, the sampling frequency will revert back to the original monitoring requirements until a new tank is required. (Table 1).

{4} Day means only a day during which either the tank is operated or a day during which normal production operations at the facility are conducted, and week means Monday through Friday.

(2) If the facility exceeds 40 operating hours in a week, the original monitoring requirements from Table 1 of the operation and maintenance plan must be used (These requirements may be implemented instead of the alternative monitoring requirements if the facility may exceed 40 operating hours in a week.):

Table 1 Original Monitoring Requirements

Inspection Level	Time of Continuous Anodize Tank Operation at Less Than or Equal to 45 dynes/cm (1)	Frequency of Surface Tension Readings	Actions Required Based on Results of Surface Tension Reading
Level 1	0 to 40 hours	Every 4 operating hours	If the surface tension readings are less than or equal to 45 dynes/cm after 40 hours of operation, then proceed to Inspection Level 2.
Level 2	41 to 80 hours	Every 8 operating hours	If the surface tension readings are less than or equal to 45 dynes/cm after 80 hours of operation, then proceed to Inspection Level 3.
Level 3	Greater than 80 hours	Every 40 operating hours	If the surface tension readings are less than or equal to 45 dynes/cm, then remain at Inspection Level 3. (2)

Notes:

{1} The time of continuous anodize tank operation is defined as accumulated time when the chromic acid anodize current is flowing.

{2} If any reading is greater than 45 dynes/cm, then shut down the chromic acid anodize tank operation.

(3) A new tank is defined as any time over 50% of the volume of the tank is removed at one time and the tank remade.

Reporting:

(1) The permittee shall submit a semiannual Ongoing Compliance Status Report.

EU0170
Coal Storage Pile

		FEDER	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 10 CSR 10-5.120: Information on Sales of Fuels to be Provided and Maintained	DESCRIPTION (for information only, this does not create any permit requirements)
SP-005-01	SP-005-01	X	Coal storage pile

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0170-001

10 CSR 10-5.120
Information on Sales of Fuels to be Provided and Maintained

Emission Limitations:
None

Record Keeping:
Coal tickets for coal deliveries must be retained for one (1) year

Monitoring:
None

Reporting:
None

EU0180
Gasoline Storage Tanks

		FEDERAL						
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 80.22 (j)	2) 10 CSR 10-5.220: Control of Petroleum Liquid Storage, Loading and Transfer (Tanks greater than 1,000 gallons)	3) 10 CSR 10-5.220: Control of Petroleum Liquid Storage, Loading and Transfer (Tanks greater than 500 gals and less than or equal to 1,000 gas)	4) Operating Permits Obtained Per the Requirements of 10 CSR 10-	5) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-	6) 10 CSR 10-5.443: Control of Gasoline Reid Vapor	**DESCRIPTION** (for information only, this does not create any permit requiremen
ST-STL-01	ST-022-22	X	X	NA	C2471	#V1072	X	Gasoline UST (8,000 gal)
ST-STL-01	ST-022-25	X	X	NA	C2471	#V1072	X	Gasoline UST (10,000 gal)
ST-STL-01	ST-041-20	X	X	NA	C2474	NA	X	Gasoline UST (8,000 gal)
ST-STL-01	ST-066-02	X	NA	X	NA	NA	X	Gasoline storage tank (~560 gal)
ST-STL-01	ST-102B-01	NA	NA	NA	NA	NA	X	Gasoline storage tank (298 gal)
ST-STL-01	ST-121-01	X	NA	X	NA	NA	X	Gasoline tank (550 gal)
ST-STL-01	ST-220-01	NA	NA	NA	NA	NA	X	Gasoline tank (~300 gal)
ST-STL-01	ST-245-02	NA	NA	NA	NA	NA	X	Gasoline tank (301 gal)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0180-001

10 CSR 10-5.220
Control of Petroleum Liquid Storage, Loading and Transfer (Tanks Greater Than 1,000 Gallons)

Emission Limitations:

(1) All gasoline storage tanks with a capacity greater than 1,000 gallons shall be equipped with a submerged fill pipe unrestricted to within six (6) inches of the bottom of the tank; all storage caps and fittings shall be vapor tight when gasoline transfer is taking place; and each tank shall be vented via conduit that is at least two (2) inches inside diameter, a minimum of twelve (12) foot above grade and equipped with a pressure/vacuum vent cap that is CARB approved.
   (a) If a deficiency is found in the equipment standards listed in (1), the facility shall be allowed 30 days after discovery to bring the unit into compliance with the standards.
(2) System shall be equipped with Stage I and Stage II vapor recovery systems which are MoPETP approved systems.

Record Keeping:

(1) Delivery records shall be kept at the facility. Retention of delivery records onsite will be limited to the four (4) most recent receipts of each grade of product.
(2) A copy of self inspections and repairs to correct deficits will be maintained on site.

Monitoring:

(1) Stage II shall be inspected on a periodic (monthly) basis.
(2) Permittee will perform blockage and leakage tests on Stage II systems as directed by local regulatory agency.

Reporting:

None

Permit Condition EU0180-002

10 CSR 10-5.220
Control of Petroleum Liquid Storage, Loading and Transfer (Tanks Greater Than 500 Gallons and Less Than or Equal to 1,000 Gallons)

Emission Limitations:

(1) All gasoline storage tanks with a capacity greater than 500 gallons shall be equipped with a submerged fill pipe unrestricted to within six (6) inches of the bottom of the tank; all storage caps and fittings shall be vapor tight when gasoline transfer is taking place; and each tank shall be vented via conduit that is at least two (2) inches inside diameter, a minimum of twelve (12) foot above grade and equipped with a pressure/vacuum vent cap that is CARB approved.

(a) If a deficiency is found in the equipment standards listed in (1), the facility shall be allowed 30 days to bring the unit into compliance with the standards.

Record Keeping:

Delivery records shall be kept at the facility. Retention of delivery records onsite will be limited to the four (4) most recent receipts of each grade of product.

Monitoring:

None

Reporting:

None

Permit Condition EU0180-003
10 CSR 10-5.220 ***Permits Obtained Per the Requirements of 10 CSR 10-5.220***

(1) Operating Permits: **C2471, C2474**

Emission Limitations:

None

Record Keeping:

None

Monitoring:

None

Reporting:

None

II) State/Local Only Enforceable Requirements

Permit Condition EU0180-004
10 CSR 10-5.443 ***Control of Gasoline Reid Vapor Pressure***

Emission Limitations:

Selling, dispensing, etc. gasoline with an RVP exceeding 7.0 psi is prohibited between 6/1 and 9/15 of each year, unless the gasoline is a blend with at least 9% to 10% ethyl alcohol by volume, in which case the RVP may not exceed 8.0 psi during the same period. By only buying compliant gasoline from 6/1 through 9/15 each year the tank will be deemed to be in compliance. The use of reformulated gasoline by definition complies with this rule.

Record Keeping:

Records shall be kept of the documents accompanying all gasoline shipments to this tank between 6/1 and 9/15. These records will indicate the Reid vapor pressure of the gasoline or that it is reformulated gasoline.

Monitoring:

None

Reporting:

The permittee shall report to the St. Louis County Health Department Air Pollution Control Section at 111 S. Meramec Ave., Clayton, MO 63105 and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, no later than thirty (30) days after the discovery of any exceedance of the Reid vapor pressure for non-reformulated gasoline required by Emission Limitations.

EU0190
Fuel Storage Tanks

		FEDERA	
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 60, Subpart Kb, 60.116(b) and 10 CSR 10-6.070	**DESCRIPTION** (for information only, this does not create any permit requirements)
NONE	ST-005-20	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-005-21	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-041-21	X	Jet fuel UST #1 (30,000 gal) A-41
NONE	ST-041-22	X	Jet fuel UST #2 (30,000 gal) B-41
NONE	ST-041-23	X	Jet fuel UST #3 (30,000 gal) C-41
NONE	ST-041-24	X	Jet fuel UST #4 (30,000 gal) D-41
NONE	ST-102-21	X	Fuel oil #2 UST (20,000 gal)
NONE	ST-110-20	X	Fuel oil #2 UST (15,000 gal)
NONE	ST-120-01	NA	Vertical fuel oil #2 (107,000 gal)
NONE	ST-120-02	NA	Vertical fuel oil #2 (50,000 gal)
NONE	ST-111-01	X	Fuel oil #2 underground storage tank (12,000 gal)

X = Applicable NA = Not Applicable

COMPLIANCE REQUIREMENTS

Federally Enforceable Requirements

Permit Condition EU0190-001

10 CSR 10-6.070 and 40 CFR Part 60 Subpart Kb, 60.116(b)
Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction , Reconstruction, or Modification Commenced After July 23, 1984

Emissions Limitations:
None

Recordkeeping:
Records of the tank dimensions and capacity shall be kept for the life of the tank.

Monitoring:
None

Reporting:
None

EU0200
Vapor Degreasers

		FEDERAL			
EIQ POINT NUMBER	EMISSION UNIT NUMBER	1) 40 CFR Part 63, Subpart T and 10 CSR 10-6.075: Halogenated Solvent Cleaning NESHAP	2) 10 CSR 10-5.300: Control of Emissions from Solvent Metal Cleaning	3) Requirements of the Listed Construction Permits Obtained Under 10 CSR 10-6.060	**DESCRIPTION** (for information only, this does not create any permit requirements)
VD-027-01	VD-027-01	X	X	#6325	Batch Vapor degreaser (trichloroethylene)
VD-029-01	VD-029-01	X	X	#6258	Batch Vapor degreaser (trichloroethylene)
VD-042-01	VD-042-01	X	X	#5083	Batch Vapor degreaser (Vertrel SMT) *PHILLIPS*
VD-101-01	VD-101-01	X	X	#1172	Batch Vapor degreaser (trichloroethylene)
VD-101-02	VD-101D-04	X	X	#6168	Batch Vapor degreaser (trichloroethylene
VD-102-01	VD-102-01	X	X	#1175	Batch Vapor degreaser (trichloroethylene)

X = Applicable NA = Not Applicable

Harriett Jones

01/26/2004 02:03 PM

To: Pamela.Muren@dnr.mo.gov, Amish.Daftari@dnr.mo.gov
cc: Richard Tripp/ARTD/R7/USEPA/US@EPA, Donald Toensing/ARTD/R7/USEPA/US@EPA, Robert Patrick/CNSL/R7/USEPA/US@EPA
Subject: Boeing

I just got off the phone. It was Yvonne Pierce of Boeing about the open/closed containers.

She's still wanting to pursue an equivalency determination that their open flip tops qualify as closed.

Here's what I suggested: The permit now doesn't even have the words "flip top" in it. It just says what the reg says which is keep the containers closed when not in use.

How about we don't even discuss flip tops or anything else in the SoB ?

She said she was willing to go along with that approach.

It's the only way I know to get this permit out.

Richard is in Washington, DC this week . . but I know he is not in favor of approving any kind of equivalency determination.

I tried to explain to her once again that enforcement discretion is always a possibility - not every deviation is a violation - and not every deviation/violation is deserving of a formal enforcement response. But, we don't put future pre-approvals of deviations and guarantees of future enforcement discretion in writing.

Harriett Jones, P.E.
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Air Permitting and Compliance Branch
Air, RCRA, and Toxics Division

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